

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GLEN THOMPSON, JR. and GLEN
THOMPSON, SR.,

Plaintiffs,

vs.

ON-SITE MANAGER, INC.

Defendant.

NO. 2:15-cv-01596-TSZ

DECLARATION OF ELIZABETH K.
MORRISON IN SUPPORT OF ON-SITE
MANAGER, INC.'S MOTION TO
COMPEL DISCOVERY

Noted for Consideration: June 17, 2016

I, Elizabeth K. Morrison, declare as follows:

1. I am over the age of eighteen, have personal knowledge regarding the facts alleged herein and am competent to testify regarding the same.

2. I am one of the attorneys representing On-Site Manager, Inc. ("On-Site") in this matter.

3. On March 16, 2016, On-Site propounded discovery on Plaintiffs, including Interrogatories and Requests for Production. On April 18, 2016, Plaintiffs provided responses. Attached as **Exhibits A** and **B** are true and correct copies of the responses received by Plaintiffs in response to On-Site's discovery. In addition, Plaintiffs produced approximately 70+ pages of

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documents that were divided into 8 “batches” of documents, the overwhelming majority of which consisted of copies of Plaintiffs’ rental reports, letters sent by Plaintiffs’ attorney, and documents that On-Site had produced during discovery. In the interest of judicial economy, the 70+ pages are not included in Exhibits A and B, but can be provided upon request.

4. On May 25, 2016 and May 26, 2016, I conducted a discovery conference with Plaintiffs’ attorney, Eric Dunn, regarding the Plaintiffs’ inadequate discovery responses. With regard to requests related to the Plaintiffs’ finances, Mr. Dunn indicated that producing these documents was “too burdensome” for his clients and that such information was “not relevant” to this matter. I indicated that the information was relevant to Plaintiffs’ allegation that the reason they were denied housing was the eviction lawsuit and to On-Site’s defenses regarding the same. We were unable to come to an agreement on this issue.

Similarly, when asked about the interrogatories regarding the Plaintiffs’ outstanding debts and various collection actions, Mr. Dunn indicated that producing these documents was “too burdensome” for his clients and that they were not relevant to this matter. Again, I indicated the relevance to Plaintiffs’ claims as well as On-Site’s defenses to those claims. When asked whether an independent inquiry had been made to the creditors or to the Court in an effort to obtain documents, Mr. Dunn indicated that no such attempt had been made for any request. We were unable to resolve these issue.

Mr. Dunn indicated a willingness to revisit the Plaintiffs’ responses that failed to properly identify specific responsive documents. If/when such designations are provided, On-Site will withdraw the corresponding arguments regarding the Plaintiffs’ failure to properly identify documents in accordance with Rule 34, as noted in On-Site’s motion.

5. Attached as **Exhibits C** and **D** are true and correct copies of rental reports for the Plaintiffs for Club Palisades (**Exhibit C**) and The Lodge (**Exhibit D**). These documents were produced by On-Site during discovery and then re-produced by Plaintiffs in discovery.

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1 I declare under penalty of perjury of the laws of the State of Washington that the above is
2 true and correct.

3
4 Dated: May 26, 2016

5
6 /s/Elizabeth K. Morrison
Elizabeth K. Morrison, WSBA #43042
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DECLARATION OF SERVICE

The undersigned declares under penalty of perjury under the laws of the State of Washington that on this day, I electronically filed a true and accurate copy of the document to which this declaration is affixed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

Attorneys for Plaintiff:

Eric Dunn
 Allyson O'Malley-Jones
 Leticia Camacho
 Northwest Justice Project
 401 Second Avenue S, Suite 407
 Seattle, WA 98104
 Tel.: (206) 464-1519
 Fax: (206) 624-7501

☐
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U.S. Mail Postage Prepaid
 CM/ECF
 Hand Delivery
 Email: EricD@nwjustice.org
leticia@nwjustice.org

Dated this 26th day of May 2016.

/s/ Stephanie M. Hosey

Stephanie M. Hosey, Legal Secretary

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HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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Plaintiffs,

vs.

ON-SITE MANAGER, INC.

Defendant.

NO. 2:15-cv-01596-TSZ

**DEFENDANT ON-SITE MANAGER,
INC.'S FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION
TO PLAINTIFF GLENN THOMPSON,
JR. AND RESPONSES THERETO**

TO: PLAINTIFF GLENN THOMPSON, JR.

AND TO: Eric Dunn, Allyson O'Malley-Jones, and Leticia Camacho, his attorneys
of record.

INSTRUCTIONS

A. Interrogatories

Pursuant to Fed. R. Civ. P 26 and 33, you are requested to answer the following
interrogatories, in writing, and under oath, and after you and your attorney sign them below, you
are to serve a copy upon the undersigned counsel at the offices of Gordon & Rees LLP, 701 Fifth

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ORIGINAL

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1 Avenue, Suite 2100, Seattle, Washington 98104, within thirty (30) days after they are served on
 2 you. These interrogatories are intended as continuing interrogatories, requiring you to answer by
 3 supplemental answers, setting forth any information within the scope of the interrogatories that
 4 may be acquired by you or by your employees, agents, attorneys, or representatives following
 5 your original answers. Let us know if you would like to receive these discovery requests
 6 electronically for ease of answering.

7 **B. Requests for Production**

8 Pursuant to Fed. R. Civ. P 26 and 34, you are also requested to produce, for inspection
 9 and copying, the documents described in each request made below, at the offices of Gordon &
 10 Rees LLP, 701 Fifth Avenue, Suite 2100, Seattle, Washington 98104. True and accurate copies
 11 of the requested documents may be produced with the answers to these interrogatories, but in any
 12 event, shall be provided within thirty (30) days after they are served on you. These requests for
 13 production are directed to you and to your agents, attorneys, accountants, consultants,
 14 representatives, private investigators, and any and all persons acting on your or their behalf.
 15 These requests for production are intended to encompass the original and all non-duplicate
 16 copies (those that differ from the original in some respect) of all documents of any nature which
 17 are now or have, at any time, been within your care, custody, or control.

18 **DEFINITIONS**

19 Included below are definitions of the terms used in this set of discovery. Please read
 20 through these definitions carefully, as some of the terms are given definitions that may be more
 21 expansive than the definitions of those terms in common usage.

22 1. The terms “ALL” in addition to its ordinary meanings, including “any,” “each,”
 23 and “every.”

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1 2. The term “**BANK(S)**” shall mean a financial establishment for the deposit, loan,
2 exchange, or issue of money and for the transmission of funds, esp. a member of the Federal
3 Reserve System.

4 3. The term “**COMMUNICATION(S)**” means any manner or form of information
5 or message transmission, whether verbal or nonverbal, written or oral, including any meeting,
6 telephone call, video conference, conversation, letter, memorandum, text message, electronic
7 mail, or document, or other form of communication, whether verbal or nonverbal, written or oral.

8 4. “**COMPLAINT**” means **YOUR COMPLAINT** filed in United States District
9 Court Western District of Washington at Seattle, Cause No. 2:15-cv-01596-TSZ.

10 5. The term “**DESCRIBE**” in addition to its ordinary meaning, means to provide a
11 factual and/or legal explanation, summary, and/or account of the item, **PERSON**, event,
12 transaction, and/or object to be described with sufficient clarity so as to provide the reader with a
13 reasonably clear understanding of **YOUR** answer.

14 6. The term “**DEBT(S)**” shall mean liability on a claim; a specific sum of money
15 due by agreement or otherwise.

16 7. The term “**DOCUMENT(S)**” means any kind of written, printed, typed, recorded,
17 or graphic matter or communication, however produced or reproduced, and electronically stored
18 information, of any kind or description, whether sent, received, or neither, including originals, all
19 copies, and all drafts and both sides thereof, and including but not limited to: 3-mail and other
20 electronically stored information, including but not limited to all data stored on any computer
21 medium, whether or not such data has ever been printed on paper, correspondence, records,
22 tables, charts, papers, analyses, graphs, indexes, schedules, reports, memoranda, notes, diaries,
23 logs, change orders, letters, telegrams, messages (including but not limited to, reports of
24 telephone conversations and conferences), call logs, policies, handbooks, procedures, employee
25 handbooks, call sheets, studies, books, pamphlets, periodicals, magazines, booklets, circulars,

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bulletins, instructions, minutes, other communications (including, but not limited to inter-and intra-office communications), contracts, memoranda of agreement, purchase agreements, security agreements, promissory notes, bills of sale, assignments of copyright, letters of credit, financing statements, appraisals, tax statements, options to purchase, escrow agreements, orders, bills, checks, vouchers, books of account, notebooks, data sheets, data processing cards, wage statements, photographs, photographic negatives, sound recordings, video recordings, brochures, and all other written matter of any kind or any and all other data or compilation from which information can be obtained and translated, if necessary. In addition, each request should be considered as including all copies and, to the extent applicable, preliminary drafts of documents which, as to content, differ in any respect from the original or final draft or from each other.

1. The term "**IDENTIFY**" in addition to its ordinary meaning, means:

a) When used with reference to a natural **PERSON**: state the **PERSON'S** (1) full name; (2) present or last-known business and residential addresses; (3) present or last-known telephone numbers; (4) present or last-known employer and position or job title with that employer, and (5) relationship to **YOU**.

b) When used with reference to a **PERSON** other than a natural **PERSON**, such as a business entity: (1) state the **PERSON'S** full name; (2) give the present or last-known address of its principal office or place of doing business; (3) state the type of entity (e.g. corporation, partnership, unincorporated association, etc.) that the **PERSON** is, and (4) describe the **PERSON'S** relationship to **YOU**.

c) When used with reference to a writing or **DOCUMENT**: state with respect to each such writing or **DOCUMENT**: (1) the date, author, nature and substance of the document with sufficient particularity to enable the same to be identified in a subpoena duces tecum or request for production; (2) the type of **DOCUMENT**; and (3) the identify of the **PERSON** who has custody of the **DOCUMENT**.

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1 d) When used in reference to a **COMMUNICATION**: state with respect to each
2 such **COMMUNICATION**: (1) the **PERSON** who made it; (2) the date of the
3 **COMMUNICATION**; (3) the **PERSON** who received, took, or recorded it; (4) all
4 **PERSON(S)**, if any, present during the making of the **COMMUNICATION**; (5) when, where,
5 and how it was made, taken, or recorded; (6) the substance or subject matter of the
6 **COMMUNICATION**; and (7) the **PERSON** who has current or last known possession,
7 custody, or control of the **COMMUNICATION**.

8 e) When used with reference to information: provide a detailed description of the
9 requested information.

10 8. **"THE LODGE"** means the apartment complex located at 3220 Military S.,
11 Federal Way, WA 98001, and any and all persons or entities that manage the property, including
12 Greystar Management.

13 9. **"ON-SITE"** means On-Site Manager, Inc. and **ALL PERSONS** or entities
14 employed at On-Site Manager, Inc.

15 10. **"PALISADES"** means the apartment complex located at 2211 S. Star Lake Rd.
16 Federal Way, WA 98003, and any and all persons or entities that manage the property, including
17 FPI Management, Inc.

18 11. The term **"PERSON(S)"** means any natural person or entity, including without
19 limitation, individuals, partnerships, firms, associations, joint ventures, corporation, or other
20 entities, whether real or fictitious.

21 12. The term **"RELATE TO"** or **"RELATED TO"** or **"RELATING TO"** or
22 **"RELATION TO"** shall mean constituting, defining, containing, regarding, describing,
23 embodying, reflecting, identifying, stating, concerning, referring to, evidencing, dealing with, or
24 in any way pertaining to.

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1 13. The term “YOU” or “YOUR” means Glenn P. Thompson, Jr. or anyone acting on
2 his behalf, including, but not limited to, any agents, employees, attorneys, and/or representatives.

3
4
5 **DUTY TO SUPPLEMENT ANSWERS**

6 The following Interrogatories and Requests for Production shall be deemed continuing so
7 as to require you, to the extent required by Fed. R. Civ. P. 26(e), to produce additional
8 information and/or documents if you, your agents, representatives, or attorneys gain access to
9 additional information and/or documents that is or may be responsive to these Interrogatories and
10 Requests for Production between the time you sign your answers to these Interrogatories and
11 Requests for Production and trial.

12 **INTERROGATORIES**

13 **INTERROGATORY NO. 1:** **IDENTIFY ALL BANKS** that **YOU** have done
14 business with in the last five (5) years, including the name, address, and time **YOU** conducted
15 business with the **BANK**.

16 **ANSWER:**

17
18 **PLAINTIFF OBJECTS TO THIS INTERROGATORY AS UNDULY**
19 **BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE**
20 **EVIDENCE.**

21
22 **INTERROGATORY NO. 2:** **IDENTIFY ALL** credit cards **YOU** have held over
23 the last five (5) years, including the name of the card, the issuing financial institution, the dates
24 the credit card was active, the date **YOU** closed the account (if applicable), the credit limit of the
25 card, the current balance, if any, and whether **YOU** ever over-drafted the account.

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1 **ANSWER:**

2 **PLAINTIFF OBJECTS TO THIS INTERROGATORY AS UNDULY**
3 **BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE**
4 **EVIDENCE.**

5
6 **INTERROGATORY NO. 3:** **IDENTIFY YOUR** credit score(s) since January 1,
7 2015, including the credit agency **YOU** obtained your score(s) from.

8 **ANSWER:**

9 **PLAINTIFF OBJECTS TO THIS INTERROGATORY AS UNDULY**
10 **BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE**
11 **EVIDENCE.**

12
13 **INTERROGATORY NO. 4:** **IDENTIFY and DESCRIBE ALL DEBTS YOU**
14 **incurred and/or have made payments on over the last five (5) years, including the date the DEBT**
15 **was incurred, the entity to whom the DEBT is owed, the initial amount of the DEBT, the current**
16 **balance owing on the DEBT, whether the DEBT was ever delinquent or past due, and whether**
17 **the DEBT has ever been referred to collections.**

18
19 **ANSWER:**

20 **PLAINTIFF OBJECTS TO THIS INTERROGATORY AS UNDULY**
21 **BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE**
22 **EVIDENCE.**

23 **WITHOUT WAVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:**
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1 AROUND 2010-2011, I WAS HOSPITALIZED AND ACQUIRED SOME MEDICAL
2 DEBT. I DON'T HAVE ANY DETAILS ABOUT THE DEBT IN TERMS OF INITIAL
3 AMOUNT OR CURRENT STATUS.

4
5 **INTERROGATORY NO. 5:** IDENTIFY and DESCRIBE ALL judgments,
6 liens, or garnishments against YOU in the last ten (10) years.

7 **ANSWER:**

8
9 PLAINTIFF OBJECTS TO THIS INTERROGATORY AS UNDULY
10 BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE
11 EVIDENCE.

12
13 WITHOUT WAVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:

14 I WAS HOSPITALIZED AND ACQUIRED SOME MEDICAL DEBT. I
15 UNDERSTAND THAT THE RAY KLEIN DEBT THAT APPEARED IN THE TENANT
16 SCREENING REPORT PREPARED BY ON-SITE IS RELATED TO THAT MEDICAL
17 DEBT.

18 THE WASHINGTON STATE EMPLOYMENT SECURITY AGENCY
19 GARNISHED AROUND \$300 TOTAL FROM MY WAGES IMMEDIATELY AFTER A
20 PERIOD OF UNEMPLOYMENT. OTHERWISE, I HAVE NEVER BEEN SERVED
21 WITH NOTICE OF AND AM NOT AWARE OF ANY OTHER JUDGMENTS, LIENS,
22 OR GARNISHMENTS IN THE LAST 10 YEARS.

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26 DEFENDANT'S FIRST INTERROGATORIES AND
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1 **INTERROGATORY NO. 6:** **IDENTIFY ALL** residential complexes that **YOU**
2 have applied to in the last five (5) years, including the name of the complex, address of the
3 complex, date **YOU** applied, whether **YOUR** application was accepted, date(s) of residence (if
4 any), the rent, and why **YOU** left (if applicable).

5
6 **ANSWER:**

7
8 **I ALWAYS LIVED WITH MY FATHER PRIOR TO 2016 AND IT WAS**
9 **ALWAYS MY FATHER WHO APPLIED FOR HOUSING ON MY BEHALF.**
10 **HOWEVER, AS OF JANUARY 2016, MY FATHER HAS AN APARTMENT AND I AM**
11 **STILL HOMELESS.**

12 **PLEASE SEE MY FATHER'S RESPONSE TO YOUR IDENTICAL QUESTION**
13 **FOR DETAILS.**

14
15
16
17 **INTERROGATORY NO. 7:** **IDENTIFY and DESCRIBE ALL YOUR**
18 residences for the last five (5) years including, but not limited to: the address, any rent/mortgage
19 payments **YOU** made associated with the residence, **YOUR** dates of residency, and reason for
20 leaving.

21
22 **ANSWER:**

23
24 **SEE RESPONSE TO INTERROGATORY NO. 6.**

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1
2 **INTERROGATORY NO. 8:** IDENTIFY ALL medical (including mental health)
3 treatment YOU received that YOU claim is RELATED TO ON-SITE'S actions, including the
4 name of YOUR treating physician, dates of treatment, reason(s) for seeking treatment, diagnosis,
5 treatment plan, and prognosis.

6 **ANSWER:**

7
8 PLAINTIFF OBJECTS TO THIS INTERROGATORY BECAUSE DEFENDANT
9 SEEKS TO OBTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL
10 AND TO WHICH IT HAS NO LEGAL RIGHTS WHATSOEVER. PLAINTIFF
11 OBJECTS TO THIS REQUEST AS IT IS UNLIKELY TO LEAD TO THE DISCOVERY
12 OF ADMISSIBLE EVIDENCE. AS THERE IS NO LEGAL BASIS FOR DEFENDANT
13 TO OBTAIN PLAINTIFF'S MEDICAL OR MENTAL HEALTH RECORDS,
14 PLAINTIFF FURTHER OBJECTS TO THIS INTERROGATORY AS BEING
15 INTERPOSED BY DEFENDANT SOLELY FOR THE PURPOSE OF HARASSMENT.

16
17 **INTERROGATORY NO. 9:** IDENTIFY and DESCRIBE ALL
18 COMMUNICATIONS between YOU and PALISADES between January 1, 2015 and present,
19 including the date, the representative from PALISADES, and the contents of YOUR
20 COMMUNICATION.

21
22 **ANSWER:**

23
24 I HAVE NOT HAD ANY COMMUNICATION WITH PALISADES. ALL THE
25 COMMUNICATION WAS DONE BY MY FATHER ON HIS AND MY BEHALF.

26
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1 PLEASE SEE MY FATHER'S RESPONSE TO YOUR IDENTICAL QUESTION
2 FOR DETAILS.

3
4 **INTERROGATORY NO. 10:** IDENTIFY and DESCRIBE ALL
5 COMMUNICATIONS between YOU and THE LODGE between January 1, 2015 and
6 present, including the date, the representative from THE LODGE, and the contents of YOUR
7 COMMUNICATION.

8 **ANSWER:**

9
10 I HAVE NOT HAD ANY COMMUNICATION WITH THE LODGE. ALL THE
11 COMMUNICATION WAS DONE BY MY FATHER ON HIS AND MY BEHALF.

12 PLEASE SEE MY FATHER'S RESPONSE TO YOUR IDENTICAL QUESTION
13 FOR DETAILS.

14
15 **INTERROGATORY NO 11:** IDENTIFY and DESCRIBE ALL
16 COMMUNICATIONS between YOU and ON-SITE, including the date, the representative
17 from ON-SITE, and the contents of YOUR COMMUNICATION.

18 **ANSWER:**

19
20 I HAVE NOT PERSONALLY HAD ANY COMMUNICATION WITH ON-SITE.
21 ALL THE COMMUNICATION WAS DONE BY THE FATHER ON HIS AND MY
22 BEHALF. PLEASE SEE MY FATHER'S RESPONSE TO YOUR IDENTICAL
23 QUESTION FOR DETAILS.

24
25
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1 **INTERROGATORY NO. 12:** Has Eric Dunn represented YOU in any other
2 lawsuits? If so, identify the cause number, court, date, subject matter of the lawsuit, and the
3 resolution of the lawsuit.

4 **ANSWER:**

5
6 **NO**

7 **INTERROGATORY NO 13:** IDENTIFY and DESCRIBE ALL the facts and
8 circumstances YOU believe support YOUR allegation that ON-SITE was willful or "at least
9 negligent" in obtaining information contained in YOUR consumer report, as alleged in
10 Paragraph 4.A.5 of YOUR COMPLAINT.

11 **ANSWER:**

12
13 **PLAINTIFF OBJECTS TO THIS INTERROGATORY AS MISSTATING**
14 **PARAGRAPH 4.A.5 OF THE COMPLAINT WHICH SPECIFICALLY STATES THAT**
15 **ON-SITE FAILED TO FOLLOW REASONABLE PROCEDURES IN PREPARING**
16 **CONSUMER REPORTS AND THAT ITS IMPROPER CREDIT REPORTING**
17 **ACTIVITIES OCCUR WITHIN THE SCOPE OF TRADE IN MAKING TENANT-**
18 **SCREENING REPORTS ABOUT WASHINGTONIAN RENTAL APPLICANTS.**

19 **WITHOUT WAIVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:**

20 **ON OR AROUND JUNE 2015, MY FATHER, GLENN THOMPSON, SR, AND I**
21 **APPLIED FOR RENTAL HOUSING AT A PROPERTY CALLED THE LODGE, IN**
22 **KING COUNTY. WE PAID SCREENING FEES TO APPLY. THE LODGE DENIED**
23 **OUR RENTAL APPLICATION BASED ON TENANT SCREENING REPORTS FROM**
24 **ON-SITE MANAGER, INC.**

25
26 **DEFENDANT'S FIRST INTERROGATORIES AND**
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1 MY FATHER CALLED ON-SITE MANAGER TO INQUIRE ABOUT THE
2 REASON OUR APPLICATION TO "THE LODGE" HAD BEEN TURNED DOWN.
3 THE ON-SITE REPRESENTATIVE TOLD US IT WAS BECAUSE OF AN EVICTION
4 CASE RELATED TO A "PATRICIA ANN THOMPSON" AND RENTAL PREMISES AT
5 2917 – 12TH AVE S. IN SEATTLE. NEITHER ONE OF US KNOWS WHO PATRICIA
6 ANN THOMPSON IS. WE ARE BOTH MALE AND WE HAVE NEVER LIVED AT
7 THAT ADDRESS. WE GAVE THE ON-SITE REPRESENTATIVE THIS
8 INFORMATION, AND ON-SITE AGREED TO DELETE THE EVICTION RECORDS.

9 IN JULY 2015, WE APPLIED TO CLUB PALISADES APARTMENTS IN
10 FEDERAL WAY. WE ALSO PAID SCREENING FEES TO APPLY THERE.
11 CLUB PALISADES ALSO SCREENED OUR APPLICATION USING ON-SITE
12 MANAGER REPORTS. ON-SITE AGAIN REPORTED THE PATRICIA ANN
13 THOMPSON EVICTION CASE FROM 2917 – 12TH AVE S. AS THOUGH THE CASE
14 BELONGED TO US—DESPITE US HAVING INFORMED ON-SITE THAT WE DO
15 NOT KNOW WHO PATRICIA ANN THOMPSON IS, HAVE NEVER LIVED AT THAT
16 ADDRESS, AND BOTH OF US ARE MALE. OUR APPLICATION AT CLUB
17 PALISADES WAS DENIED AS WELL.

18
19
20
21 **INTERROGATORY NO. 14:** IDENTIFY YOUR total monthly income between
22 January 1, 2015 and August 1, 2015.

23 **ANSWER:**

24 PLAINTIFF OBJECTS TO THIS REQUEST AS BEING UNLIKELY TO LEAD
25 TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

26 DEFENDANT'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO PLAINTIFF
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(2:15-CV-01596-TSZ)

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Seattle, WA 98104
Telephone: (206) 695-5100
Facsimile: (206) 689-2822

1 **WITHOUT WAVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:**
2 **MY INCOME DURING THAT PERIOD OF TIME WAS APPROXIMATELY \$1,749**
3 **PER MONTH IN WAGES. BUT MY FATHER ALSO HAD A HOUSING CHOICE**
4 **VOUCHER THROUGH KING COUNTY HOUSING AUTHORITY WHICH WOULD**
5 **HAVE SUBSIDIZED OUR RENT WHEN WE APPLIED FOR HOUSING IN 2015.**

6
7
8 **INTERROGATORY NO. 15: IDENTIFY and DESCRIBE ALL**
9 **COMMUNICATIONS between YOU and Patricia A. Thompson, including the date of the**
10 **COMMUNICATION, including but not limited to: all PERSONS present for the**
11 **COMMUNICATION, and the contents of the COMMUNICATIONS.**

12 **ANSWER:**

13
14 **I DON'T KNOW WHO PATRICIA A. THOMPSON IS. I HAVE NEVER MET**
15 **HER OR HAD ANY COMMUNICATION WITH HER. HOWEVER, STAFF AT ON-**
16 **SITE MIGHT KNOW SINCE IT ERRONEOUSLY LISTED THIS PERSON IN THE**
17 **TENANT SCREENING REPORT IT CREATED IN MY NAME.**

18
19 **INTERROGATORY NO. 16: IDENTIFY and DESCRIBE ALL**
20 **COMMUNICATIONS between YOU and E.A. Tucci, including, but not limited to the date of**
21 **the COMMUNICATION, all PERSONS present for the COMMUNICATION, and the**
22 **contents of the COMMUNICATION.**

23 **ANSWER:**

24 **I HAVE NEVER MET OR HAD ANY COMMUNICATION WITH E.A. TUCCI. I**
25 **DON'T KNOW WHO E.A. TUCCI IS. HOWEVER, STAFF AT ON-SITE MIGHT**

26 DEFENDANT'S FIRST INTERROGATORIES AND
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1 KNOW WHO E.A. TUCCI IS SINCE ON-SITE ERRONEOUSLY LISTED THIS
2 PERSON IN THE TENANT SCREENING REPORT IT CREATED IN MY NAME.

3
4 **REQUESTS FOR PRODUCTION**

5 **REQUEST FOR PRODUCTION NO. 1:** Produce ALL DOCUMENTS
6 RELATED TO or used in preparing YOUR response to Interrogatory No. 1 including, but not
7 limited to: ALL COMMUNICATIONS between YOU and the BANK and ALL BANK
8 statements for ALL accounts that YOU have held for the last five (5) years.

9 **ANSWER:**

10
11 PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
12 UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

13
14 **REQUEST FOR PRODUCTION NO. 2:** Produce ALL DOCUMENTS
15 RELATED TO or used in preparing YOUR response to Interrogatory No. 2 including, but not
16 limited to: ALL YOUR credit card statements from the last five (5) years, as well as ALL
17 notifications and/or COMMUNICATIONS between YOU and any credit card company(ies)
18 from the last five (5) years.

19 **ANSWER:**

20
21 PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
22 UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

23
24 **REQUEST FOR PRODUCTION NO. 3:** Produce ALL DOCUMENTS
25 RELATED TO or used in preparing YOUR response to Interrogatory No. 3 including, but not

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1 limited to: **ALL** credit reports run by **YOU**, on **YOUR** behalf, or by a third-party (including
2 **ALL** residential complexes).

3 **ANSWER:**

4
5 **PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND**
6 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

7
8
9 **REQUEST FOR PRODUCTION NO. 4:** Produce **ALL DOCUMENTS**
10 **RELATED TO** or used in preparing **YOUR** response to Interrogatory No. 4 including, but not
11 limited to: **ALL COMMUNICATIONS**, bills, invoices, notifications, past due notices,
12 pleadings, judgments, garnishments, or **ALL** other documentation **RELATED TO a DEBT.**

13 **ANSWER:**

14
15 **PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND**
16 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

17 **WITHOUT WAVING THIS OBJECTION, PLEASE SEE DOCUMENTS**
18 **ATTACHED AS VII.**

19
20
21 **REQUEST FOR PRODUCTION NO. 5:** Produce **ALL DOCUMENTS**
22 **RELATED TO** or used in preparing **YOUR** response to Interrogatory No. 5 including, but not
23 limited to: **ALL** pleadings, notices, writs, judgments, deeds, or other documentation **RELATED**
24 **TO ALL** judgments, liens or garnishments.

25 **ANSWER:**

26
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1
2 **PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND**
3 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

4 **WITHOUT WAVING THIS OBJECTION SEE RESPONSE TO REQUEST FOR**
5 **PRODUCTION NO. 5.**

6
7 **REQUEST FOR PRODUCTION NO. 6:** Produce **ALL DOCUMENTS**
8 **RELATED TO** or used in preparing **YOUR** response to Interrogatory No. 6 including but not
9 limited to: **ALL** rental applications, **ALL COMMUNICATIONS** between **YOU** and **ALL**
10 residential complexes, and **ALL** reports run by or on behalf of **ALL** residential complexes
11 **RELATED TO YOUR** application (including **ALL** consumer reports).

12 **ANSWER:**

13
14 **PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND**
15 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

16 **WITHOUT WAVING THE OBJECTION,**

17 **SEE ATTACHED DOCUMENTS LISTED AS "I", II, III, IV and VII.**

18 **SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED AS:**

19 **"CONFIDENTIAL": OSMTOOOO19 - 20, 34 -36, 53-82**

20
21
22 **REQUEST FOR PRODUCTION NO. 7:** Produce **ALL DOCUMENTS**
23 **RELATED TO** or used in preparing **YOUR** response to Interrogatory No. 7 including, but not
24 limited to: **ALL** lease agreements, rental agreements, rental checks, and **ALL**

25
26 **DEFENDANT'S FIRST INTERROGATORIES AND**
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1 COMMUNICATIONS RELATED TO ALL lease agreements, rental agreements, or rent
2 payments.

3 **ANSWER:**

4
5 **PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND**
6 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

7 **WITHOUT WAVING THE OBJECTION, SEE REQUEST FOR PRODUCTION**
8 **NO. 6.**

9
10
11 **REQUEST FOR PRODUCTION NO. 8:** Produce **ALL DOCUMENTS**
12 **RELATED TO** or used in preparing **YOUR** response to Interrogatory No. 8 including, but not
13 limited to: **ALL** medical records, **COMMUNICATIONS**, prescriptions, written
14 recommendations, treatment plans, and **ALL** other **DOCUMENTS** related to **ALL** medical
15 treatment obtained by **YOU** between January 1, 2015 and present.

16 **ANSWER:**

17
18 **PLAINTIFF OBJECTS TO THIS REQUEST BECAUSE DEFENDANT SEEKS**
19 **TO OBTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL AND TO**
20 **WHICH IT HAS NO LEGAL RIGHTS WHATSOEVER. PLAINTIFF OBJECTS TO**
21 **THIS REQUEST AS IT IS UNLIKELY TO LEAD TO THE DISCOVERY OF**
22 **ADMISSIBLE EVIDENCE. AS THERE IS NO LEGAL BASIS FOR DEFENDANT TO**
23 **OBTAIN PLAINTIFF'S MEDICAL OR MENTAL HEALTH RECORDS, PLAINTIFF**
24 **FURTHER OBJECTS TO THIS REQUEST AS BEING INTERPOSED BY DEFENDANT**
25 **SOLELY FOR THE PURPOSE OF HARASSMENT.**

26
DEFENDANT'S FIRST INTERROGATORIES AND
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REQUEST FOR PRODUCTION NO. 9: Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 9 including, but not limited to: **ALL COMMUNICATIONS**, **ALL** notes taken by you related to **ALL COMMUNICATIONS**, letters, reports, or other **DOCUMENTS YOU** received from **PALISADES**.

ANSWER:

SEE RESPONSE TO REQUEST FOR PRODUCTION NO. 6.

REQUEST FOR PRODUCTION NO 10: Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 10 including, but not limited to: **ALL COMMUNICATIONS**, **ALL** notes taken by **YOU RELATED TO ALL COMMUNICATIONS**, letters, reports, or other **DOCUMENTS YOU** received from **THE LODGE**.

ANSWER:

SEE RESPONSE TO REQUEST FOR PRODUCTION NO. 6.

REQUEST FOR PRODUCTION NO. 11: Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 11 including, but not limited to: **ALL COMMUNICATIONS** between **YOU** and **ON-SITE**; **ALL** notes **REGARDING COMMUNICATIONS** between **YOU** and **ON-SITE**; **ALL** letters from or to

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1 ON-SITE; ALL reports from ON-SITE; and ALL DOCUMENTS RELATED TO or that
2 YOU received from ON-SITE.

3 ANSWER:

4
5 SEE ATTACHED DOCUMENTS LISTED AS I, III, IV, AND VII.

6 SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED AS:

7 "CONFIDENTIAL": OSMTOOOO19 - 20, 34 -36, 53-82
8

9 REQUEST FOR PRODUCTION NO. 12: Produce ALL DOCUMENTS
10 RELATED TO or used in preparing YOUR response to Interrogatory No. 13 including, but not
11 limited to: ALL DOCUMENTS that YOU claim support YOUR allegation that ON-SITE was
12 negligent.

13 ANSWER:

14
15 SEE ATTACHED DOCUMENTS LISTED AS I, III, IV, AND VII.

16 SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED AS:

17 "CONFIDENTIAL": OSMTOOOO19 - 20, 34 -36, 53-82
18

19 REQUEST FOR PRODUCTION NO. 13: Produce ALL medical (including
20 mental health) records RELATED TO ALL medical treatment YOU claim is RELATED TO
21 ON-SITE'S alleged actions.

22 ANSWER:

23
24 PLAINTIFF OBJECTS TO THIS REQUEST BECAUSE DEFENDANT SEEKS
25 TO OBTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL AND TO

26
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1 WHICH IT HAS NO LEGAL RIGHTS WHATSOEVER. PLAINTIFF OBJECTS TO
2 THIS REQUEST AS IT IS UNLIKELY TO LEAD TO THE DISCOVERY OF
3 ADMISSIBLE EVIDENCE. AS THERE IS NO LEGAL BASIS FOR DEFENDANT TO
4 OBTAIN PLAINTIFF'S MEDICAL OR MENTAL HEALTH RECORDS, PLAINTIFF
5 FURTHER OBJECTS TO THIS REQUEST AS BEING INTERPOSED BY DEFENDANT
6 SOLELY FOR THE PURPOSE OF HARASSMENT.

7
8
9 **REQUEST FOR PRODUCTION NO. 14:** Produce ALL DOCUMENTS
10 RELATED TO ALL efforts by YOU to mitigate YOUR damages, including, but not limited to:
11 ALL rental applications filed by YOU between January 1, 2015 and present and ALL
12 documents RELATED TO ALL housing YOU attempted to obtain between January 1, 2015
13 and present.

14 **ANSWER:**

15
16 PLAINTIFF OBJECTS TO THIS REQUEST BECAUSE IT IS BROAD AND
17 UNDULY BURDENSOME AND OUTSIDE OF THE SCOPE OF THIS LITIGATION
18 TO THE EXTENT THAT IT IS ASKING FOR DOCUMENTATION OR
19 INFORMATION THAT PREDATES JUNE 2015.

20 WITHOUT WAIVING THIS OBJECTION, SEE ATTACHED DOCUMENTS
21 LISTED AS I, III, IV, V, and VII.

22
23
24 **REQUEST FOR PRODUCTION NO. 15:** Produce ALL copies of YOUR
25 attorney bills RELATED TO this lawsuit.

26 DEFENDANT'S FIRST INTERROGATORIES AND
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1 **ANSWER:**

2 **I AM REPRESENTED BY THE NORTHWEST JUSTICE PROJECT WHICH**
3 **PROVIDES FREE LEGAL ASSISTANCE TO LOW INCOME WASHINGTONIANS.**
4 **THAT DOES NOT MEAN, HOWEVER, THAT THE COURT CANNOT GRANT ME**
5 **ATTORNEY FEES AND COSTS IN THIS LITIGATION.**

6
7
8 **REQUEST FOR PRODUCTION NO. 16: Produce ALL COMMUNICATIONS**
9 **YOU received from a DEBT collector regarding a past due debt within the last five (5) years.**

10 **ANSWER:**

11
12 **PLAINTIFF OBJECTS TO THIS REQUEST AS BROAD AND UNDULY**
13 **BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE**
14 **EVIDENCE.**

15 **WITHOUT WAVING THIS OBJECTION, PLAINTIFF MAY HAVE RECEIVED**
16 **CORRESPONDENCE RELATED TO A MEDICAL DEBT BUT HE DOES NOT**
17 **CURRENTLY HAVE ANY DOCUMENTATION RELATED TO THE MEDICAL DEBT.**

18
19 **REQUEST FOR PRODUCTION NO. 17: Produce ALL DOCUMENTS**
20 **RELATED TO YOUR income between January 1, 2015 and August 1, 2015.**

21 **ANSWER:**

22
23 **PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND**
24 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

25
26 DEFENDANT'S FIRST INTERROGATORIES AND
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1 **WITHOUT WAVING THIS OBJECTION, SEE ATTACHED DOCUMENTS**
2 **LISTED AS VIII.**

3
4
5 **REQUEST FOR PRODUCTION NO. 18:** Produce **ALL DOCUMENTS**
6 **RELATED TO ALL COMMUNICATIONS** between **YOU** and Patricia A. Thompson,
7 including, but not limited to: **ALL** letters, notes, notices, or records of telephone conversations.

8 **ANSWER:**

9
10 **SEE PLAINTIFF'S RESPONSE TO INTERROGATORY 15.**

11
12 **REQUEST FOR PRODUCTION NO. 19:** Produce **ALL DOCUMENTS**
13 **RELATED TO ALL COMMUNICATIONS** between **YOU** and E.A. Tucci, including, but not
14 limited to: **ALL** letters, notes, notices, or records of telephone conversations.

15 **ANSWER:**

16
17 **SEE PLAINTIFF'S RESPONSE TO INTERROGATORY 16.**

18
19 **REQUEST FOR PRODUCTION NO. 20:** Produce **ALL DOCUMENTS**
20 **RELATED TO** any **DEBT YOU** owe/owed to "the Ray Klein Inc. account," as referenced in
21 **YOUR** August 18, 2015 letter.

22
23 **ANSWER:**

24
25 **SEE ATTACHED DOCUMENTS LISTED AS VII.**

26
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1 **REQUEST FOR PRODUCTION NO. 21:** Produce ALL DOCUMENTS YOU claim
2 support YOUR allegation that ON-SITE'S report that YOU were sued for unlawful detainer in
3 2011 "caused or substantially contribute the denial of the plaintiffs' rental application at [THE
4 LODGE]" as alleged in Paragraph 4.A.1 of YOUR COMPLAINT.

5 **ANSWER:**

6
7 ALL THE COMMUNICATION WAS EITHER IN PERSON OR BY
8 TELEPHONE BETWEEN MY FATHER AND THE LODGE.

9
10 **REQUEST FOR PRODUCTION NO. 22:** Produce ALL DOCUMENTS YOU
11 claim support YOUR allegation that "[ON-SITE] failed to establish or follow reasonable
12 procedures to avoid improperly attributing unlawful detainer case records to rental applications"
13 as alleged in Paragraph 4.A.2 of YOUR COMPLAINT.

14 **ANSWER:**

15
16 SEE DOCUMENTS ATTACHED LISTED AS I, III, AND IV.

17
18 **REQUEST FOR PRODUCTION NO. 23:** Produce ALL DOCUMENTS YOU
19 claim support YOUR allegation that "[ON-SITE] failed to follow reasonable procedures to
20 assure the maximum possible accuracy of the consumer reports it prepared about plaintiffs and
21 sent to Club Palisades in July 2015" as alleged in Paragraph 4.A.3 of YOUR COMPLAINT.

22 **ANSWER:**

23
24 SEE DOCUMENTS ATTACHED LISTED AS I, III, AND IV.

25
26 DEFENDANT'S FIRST INTERROGATORIES AND
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1 **REQUEST FOR PRODUCTION NO. 24:** Produce **ALL DOCUMENTS YOU**
2 claim support **YOUR** allegation that **ON-SITE'S** "failure to follow reasonable
3 procedures...resulted in On-Site falsely reporting...to a residential landlord Club Palisades, that
4 plaintiffs had been sued for unlawful detainer in 20011 and had a judgment entered against them.
5 This improper report caused or substantially contributed to the denial of plaintiffs' rental
6 application at Club Palisades" as alleged in Paragraph 4.A.3 of **YOUR COMPLAINT.**

7 **ANSWER:**

8
9 **SEE DOCUMENTS ATTACHED LISTED AS I, III, IV, AND VII.**

10
11 **REQUEST FOR PRODUCTION NO. 25:** Produce **ALL DOCUMENTS YOU**
12 claim support **YOUR** allegation that "On-Site's failure to follow reasonable procedures to avoid
13 mismatching unlawful detainer record to applications with similar names as the actual defendants
14 was willful. If not willful, it was at least negligent" as alleged in Paragraph 4.A.5 of **YOUR**
15 **COMPLAINT.**

16 **ANSWER:**

17
18 **SEE DOCUMENTS ATTACHED LISTED AS I, III, IV, AND VII.**

19
20 **REQUEST FOR PRODUCTION NO. 26:** Produce **ALL DOCUMENTS YOU**
21 claim support **YOUR** allegation that "On-Site's failure to properly reinvestigate the plaintiffs'
22 consumer disputes, delete or correct improper information, or make required to disclosure to the
23 plaintiffs or relevant third-parties (such as The Lodge or Club Palisades) prevented [the
24 plaintiffs] from obtaining rental housing at The Lodge or Club Palisades or other properties that
25 use On-Site for tenant screening" as alleged in Paragraph 4.A.8 of **YOUR COMPLAINT.**

26
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1 **ANSWER:**

2 **SEE DOCUMENTS ATTACHED LISTED AS I, III, IV, AND VII.**

3
4 **REQUEST FOR PRODUCTION NO. 27:**

5 Produce **ALL DOCUMENTS YOU**
6 claim support **YOUR** allegation that "On-Site's failures to properly reinvestigate the plaintiffs'
7 consumer disputes, delete or correct improper information, or make required to [sic] disclosures
8 to Plaintiffs or relevant third-parties (such as The Lodge or Club Palisades) were willful. If not
9 willful, these violations were at least negligent" as alleged in Paragraph 4.A.10 of **YOUR**
10 **COMPLAINT.**

10 **ANSWER:**

11 **SEE DOCUMENTS ATTACHED LISTED AS I, III, IV, AND VII.**

12
13 **REQUEST FOR PRODUCTION NO. 28:**

14 Produce **ALL DOCUMENTS YOU**
15 claim support **YOUR** claim for actual damages, as alleged in Paragraph 5.1.c of **YOUR**
16 **COMPLAINT**, including **ALL** receipts, letters, notifications, communications, notes, bills,
17 invoices, or other **DOCUMENTS YOU** claim show damages **RELATED TO ON-SITE'S**
18 alleged violations of Fair Credit Reporting Act and Washington Fair Credit Reporting Act.

18 **ANSWER:**

19
20 **SEE DOCUMENTS ATTACHED AS I, III, IV, AND VII.**

21 **SEE ALSO SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED**

22 **AS: "CONFIDENTIAL": OSMTOOOO19 - 20, 34 -36, 53-60.**

23
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26 DEFENDANT'S FIRST INTERROGATORIES AND
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VERIFICATION

I, Glenn Thompson, Jr., am the Plaintiff in the above-entitled action. I have read Plaintiff's responses to Defendant's First Interrogatories and Requests for Production to Plaintiff Glenn Thompson, Jr., know the contents thereof, and believe the same to be true.

DATED this 15th day of April, 2016.


Glenn Thompson, Jr.

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ATTORNEY CERTIFICATION

Pursuant to FRCP 26(g), I certify that I have read Plaintiff's responses to Defendant's First Interrogatories and Requests for Production to Plaintiff Glenn Thompson, Jr., including all answers, responses, and objections, and to the best of my knowledge, information and belief, formed after a reasonable inquiry, such answers, responses, and objections are (1) consistent with the Federal Rules of Civil Procedure by existing law; (2) not interposed for any improper purpose, such as to harass or cause unnecessary delay or needless increase in the cost of litigation; and (3) not unreasonably or unduly burdensome or expansive given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation.

DATED this 18th day of APRIL, 2016.

By: 

Eric Dunn, WSBA #36622
 Allyson O'Malley-Jones, WSBA #31868
 Leticia Camacho, WSBA #31341
 Northwest Justice Project
 Attorneys for Plaintiffs

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HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GLENN THOMPSON, JR. and GLENN
THOMPSON, SR.,

Plaintiffs,

vs.

ON-SITE MANAGER, INC.

Defendant.

NO. 2:15-cv-01596-TSZ

**DEFENDANT'S FIRST
INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO PLAINTIFF
GLENN THOMPSON, SR. AND
RESPONSES THERETO**

TO: PLAINTIFF GLENN THOMPSON, SR.

AND TO: Eric Dunn, Allyson O'Malley-Jones, and Leticia Camacho, his attorneys
of record.

INSTRUCTIONS

A. Interrogatories

Pursuant to Fed. R. Civ. P 26 and 33, you are requested to answer the following
interrogatories, in writing, and under oath, and after you and your attorney sign them below, you
are to serve a copy upon the undersigned counsel at the offices of Gordon & Rees LLP, 701 Fifth

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Facsimile: (206) 689-2822

1 Avenue, Suite 2100, Seattle, Washington 98104, within thirty (30) days after they are served on
2 you. These interrogatories are intended as continuing interrogatories, requiring you to answer by
3 supplemental answers, setting forth any information within the scope of the interrogatories that
4 may be acquired by you or by your employees, agents, attorneys, or representatives following
5 your original answers. Let us know if you would like to receive these discovery requests
6 electronically for ease of answering.

7 **B. Requests for Production**

8 Pursuant to Fed. R. Civ. P 26 and 34, you are also requested to produce, for inspection
9 and copying, the documents described in each request made below, at the offices of Gordon &
10 Rees LLP, 701 Fifth Avenue, Suite 2100, Seattle, Washington 98104. True and accurate copies
11 of the requested documents may be produced with the answers to these interrogatories, but in any
12 event, shall be provided within thirty (30) days after they are served on you. These requests for
13 production are directed to you and to your agents, attorneys, accountants, consultants,
14 representatives, private investigators, and any and all persons acting on your or their behalf.
15 These requests for production are intended to encompass the original and all non-duplicate
16 copies (those that differ from the original in some respect) of all documents of any nature which
17 are now or have, at any time, been within your care, custody, or control.

18 **DEFINITIONS**

19 Included below are definitions of the terms used in this set of discovery. Please read
20 through these definitions carefully, as some of the terms are given definitions that may be more
21 expansive than the definitions of those terms in common usage.

22 1. The terms “ALL” in addition to its ordinary meanings, including “any,” “each,”
23 and “every.”
24
25
26

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1 2. The term “**BANK(S)**” shall mean a financial establishment for the deposit, loan,
2 exchange, or issue of money and for the transmission of funds, esp. a member of the Federal
3 Reserve System.

4 3. The term “**COMMUNICATION(S)**” means any manner or form of information
5 or message transmission, whether verbal or nonverbal, written or oral, including any meeting,
6 telephone call, video conference, conversation, letter, memorandum, text message, electronic
7 mail, or document, or other form of communication, whether verbal or nonverbal, written or oral.

8 4. “**COMPLAINT**” means **YOUR COMPLAINT** filed in United States District
9 Court Western District of Washington at Seattle, Cause No. 2:15-cv-01596-TSZ.

10 5. The term “**DESCRIBE**” in addition to its ordinary meaning, means to provide a
11 factual and/or legal explanation, summary, and/or account of the item, **PERSON**, event,
12 transaction, and/or object to be described with sufficient clarity so as to provide the reader with a
13 reasonably clear understanding of **YOUR** answer.

14 6. The term “**DEBT(S)**” shall mean liability on a claim; a specific sum of money
15 due by agreement or otherwise.

16 7. The term “**DOCUMENT(S)**” means any kind of written, printed, typed, recorded,
17 or graphic matter or communication, however produced or reproduced, and electronically stored
18 information, of any kind or description, whether sent, received, or neither, including originals, all
19 copies, and all drafts and both sides thereof, and including but not limited to: 3-mail and other
20 electronically stored information, including but not limited to all data stored on any computer
21 medium, whether or not such data has ever been printed on paper, correspondence, records,
22 tables, charts, papers, analyses, graphs, indexes, schedules, reports, memoranda, notes, diaries,
23 logs, change orders, letters, telegrams, messages (including but not limited to, reports of
24 telephone conversations and conferences), call logs, policies, handbooks, procedures, employee
25 handbooks, call sheets, studies, books, pamphlets, periodicals, magazines, booklets, circulars,

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1 bulletins, instructions, minutes, other communications (including, but not limited to inter-and
2 intra-office communications), contracts, memoranda of agreement, purchase agreements,
3 security agreements, promissory notes, bills of sale, assignments of copyright, letters of credit,
4 financing statements, appraisals, tax statements, options to purchase, escrow agreements, orders,
5 bills, checks, vouchers, books of account, notebooks, data sheets, data processing cards, wage
6 statements, photographs, photographic negatives, sound recordings, video recordings, brochures,
7 and all other written matter of any kind or any and all other data or compilation from which
8 information can be obtained and translated, if necessary. In addition, each request should be
9 considered as including all copies and, to the extent applicable, preliminary drafts of documents
10 which, as to content, differ in any respect from the original or final draft or from each other.

11 1. The term “**IDENTIFY**” in addition to its ordinary meaning, means:

12 a) When used with reference to a natural **PERSON**: state the **PERSON’S** (1) full
13 name; (2) present or last-known business and residential addresses; (3) present or last-known
14 telephone numbers; (4) present or last-known employer and position or job title with that
15 employer, and (5) relationship to **YOU**.

16 b) When used with reference to a **PERSON** other than a natural **PERSON**, such as a
17 business entity: (1) state the **PERSON’S** full name; (2) give the present or last-known address of
18 its principal office or place of doing business; (3) state the type of entity (e.g. corporation,
19 partnership, unincorporated association, etc.) that the **PERSON** is, and (4) describe the
20 **PERSON’S** relationship to **YOU**.

21 c) When used with reference to a writing or **DOCUMENT**: state with respect to
22 each such writing or **DOCUMENT**: (1) the date, author, nature and substance of the document
23 with sufficient particularity to enable the same to be identified in a subpoena duces tecum or
24 request for production; (2) the type of **DOCUMENT**; and (3) the identify of the **PERSON** who
25 has custody of the **DOCUMENT**.

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d) When used in reference to a **COMMUNICATION**, state with respect to each such **COMMUNICATION**: (1) the **PERSON** who made it; (2) the date of the **COMMUNICATION**; (3) the **PERSON** who received, took, or recorded it; (4) all **PERSON(S)**, if any, present during the making of the **COMMUNICATION**; (5) when, where, and how it was made, taken, or recorded; (6) the substance or subject matter of the **COMMUNICATION**; and (7) the **PERSON** who has current or last known possession, custody, or control of the **COMMUNICATION**.

e) When used with reference to information: provide a detailed description of the requested information.

8. **"THE LODGE"** means the apartment complex located at 3220 Military S., Federal Way, WA 98001, and any and all persons or entities that manage the property, including Greystar Management.

9. **"ON-SITE"** means On-Site Manager, Inc. and **ALL PERSONS** or entities employed at On-Site Manager, Inc.

10. **"PALISADES"** means the apartment complex located at 2211 S. Star lake Rd. Federal Way, WA 98003, and any and all persons or entities that manage the property, including FPI Management, Inc.

11. The term **"PERSON(S)"** means any natural person or entity, including without limitation, individuals, partnerships, firms, associations, joint ventures, corporation, or other entities, whether real or fictitious.

12. The term **"RELATE TO"** or **"RELATED TO"** or **"RELATING TO"** or **"RELATION TO"** shall mean constituting, defining, containing, regarding, describing, embodying, reflecting, identifying, stating, concerning, referring to, evidencing, dealing with, or in any way pertaining to.

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1 13. The term “YOU” or “YOUR” means Glenn P. Thompson, Sr. or anyone acting
2 on his behalf, including, but not limited to, any agents, employees, attorneys, and/or
3 representatives.

4
5 **DUTY TO SUPPLEMENT ANSWERS**

6 The following Interrogatories and Requests for Production shall be deemed continuing so
7 as to require you, to the extent required by Fed. R. Civ. P. 26(e), to produce additional
8 information and/or documents if you, your agents, representatives, or attorneys gain access to
9 additional information and/or documents that is or may be responsive to these Interrogatories and
10 Requests for Production between the time you sign your answers to these Interrogatories and
11 Requests for Production and trial.

12 **INTERROGATORIES**

13 **INTERROGATORY NO.1:** IDENTIFY ALL BANKS that YOU have done
14 business with in the last five (5) years, including the name, address, and time YOU conducted
15 business with the BANK.

16 **ANSWER:**

17
18 PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
19 UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

20
21 **INTERROGATORY NO.2:** IDENTIFY ALL credit cards YOU have held over
22 the last five (5) years, including the name of the card, the issuing financial institution, the dates
23 the credit card was active, the date YOU closed the account (if applicable), the credit limit of the
24 card, the current balance, if any, and whether YOU ever over-drafted the account.
25

26
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ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

INTERROGATORY NO.3: IDENTIFY YOUR credit score(s) since January 1,

2015, including the credit agency YOU obtained your score(s) from.

ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

INTERROGATORY NO.4: IDENTIFY and DESCRIBE ALL DEBTS YOU

incurred and/or have made payments on over the last five (5) years, including the date the DEBT
was incurred; the entity, PERSON or company to whom the DEBT is owed; the initial amount
of the DEBT; the current balance owing on the DEBT; whether the DEBT was ever delinquent
or past due; and whether the DEBT has ever been referred to.

ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

INTERROGATORY NO.5: IDENTIFY and DESCRIBE ALL judgments,

liens, or garnishments against YOU in the last ten (10) years.

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ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS UNLIKELY TO LEAD TO THE
DISCOVERY OF ADMISSIBLE EVIDENCE, UNDULY BURDENSOME, AND MORE
EASILY OBTAINABLE THROUGH COURT INFORMATION SYSTEMS.

WITHOUT WAIVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:
PLAINTIFF DOES NOT REMEMBER BEING SERVED WITH A NOTICE OF
ANY ACTION RELATED TO A JUDGMENT OR NOTICE OF ANY JUDGMENT IN
THE LAST TEN YEARS.

INTERROGATORY NO. 6: IDENTIFY ALL residential complexes that YOU
have applied to in the last five (5) years, including the name of the complex, address of the
complex, date YOU applied, whether YOUR application was accepted, date(s) of residence (if
any), the rent, and why YOU left (if applicable).

ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS UNLIKELY TO LEAD TO THE
DISCOVERY OF ADMISSIBLE EVIDENCE AND UNDULY BURDENSOME.

WITHOUT WAIVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:
PLAINTIFF APPLIED AT AND LIVED AT THE FOLLOWING:

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1 1. AROUND 2010-2012: 11273 59TH AVE. S., SEATTLE, WA 98178. THE
2 RENT WAS AROUND \$200. WE LEFT BECAUSE THE HOUSE WAS FULL OF
3 MOLD.

4 2. AROUND 2013 - MARCH 2015: 6105 124TH STREET, SEATTLE, WA
5 98178. THE RENT WAS AROUND \$400 INITIALLY AND IT WENT UP TO AROUND
6 \$508 TOWARD THE END. WE LEFT BECAUSE THE LANDLORD NEEDED THE
7 HOUSE FOR HIS FAMILY.

8 3. APRIL - DECEMBER 2015: I WAS HOMELESS.

9 4. IN JUNE 2015, I APPLIED AT THE LODGE, ON-SITE HAS ALL THE
10 INFORMATION ABOUT THE LODGE. ON-SITE MANAGEMENT ALSO KNOWS
11 THAT MY APPLICATION AT THE LODGE WAS DENIED BECAUSE OF THE
12 INFORMATION IT PROVIDED IN THE TENANT SCREENING REPORT IT
13 CREATED ABOUT ME.

14 5. IN JULY 2015, I APPLIED AT PALISADES, ON-SITE HAS ALL THE
15 INFORMATION ABOUT PALISADES. ON-SITE MANAGEMENT ALSO KNOWS
16 THAT MY APPLICATION AT PALISADES WAS DENIED BECAUSE OF THE
17 INFORMATION IT PROVIDED IN THE TENANT SCREENING REPORT IT
18 CREATED ABOUT ME.

19 6. AFTER I WAS DENIED BY THE LODGE AND PALISADES, I CALLED
20 AN APARTMENT COMPLEX IN KENT AND WAS TOLD THAT PATRICIA ANN
21 THOMPSON'S UNLAWFUL DETAINER ACTION INFORMATION IN THE TENANT
22 SCREENING REPORT WOULD KEEP ME FROM RENTING AT THAT COMPLEX.
23 I CALLED A FEW OTHER PLACES AND WAS TOLD THE SAME THING. I
24 EXPLAINED MY SITUATION. I DID NOT FILE AN APPLICATION FOR THAT
25 REASON AT ANY OF THESE PLACES. ONE OF THE PLACES I CALLED IS

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1 GREEN TREE APARTMENTS IN SEATTLE. THEY ALSO GOT THEIR TENANT
 2 SCREENING REPORTS FROM ON-SITE. THE PERSON THERE TOLD ME THAT IF
 3 I DID NOT HAVE A LETTER FROM ON-SITE, I WOULD NOT BE GETTING AN
 4 APARTMENT FROM ANY COMPLEX THAT DEALT WITH ON-SITE
 5 MANAGEMENT. AS I WAS CALLING AROUND, ONE OF THE QUESTIONS I
 6 WOULD ASK IS: WHO DOES YOUR BACKGROUND CHECKS? IF THEY SAID ON-
 7 SITE, I WOULD SAY THANK YOU VERY MUCH AND I WOULD MOVE ON TO THE
 8 NEXT PLACE. BUT I WAS TOLD EVERYWHERE I CALLED THAT SO LONG AS
 9 THE PATRICIA ANN THOMPSON INFORMATION WAS ON MY RECORD, I
 10 WOULD NOT GET AN APARTMENT.

11 7. IN JANUARY 2016, I APPLIED FOR AND MY APPLICATION WAS
 12 ACCEPTED AT VENTANA APARTMENTS & TOWNHOMES LOCATED AT 329
 13 RIDGEWAY DRIVE #6140, KENT, WA 98032. MY CURRENT RENT IS \$294 PER
 14 MONTH.

15
 16
 17 INTERROGATORY NO. 7: IDENTIFY and DESCRIBE ALL YOUR
 18 residences for the last five (5) years including, but not limited to: the address, any rent/mortgage
 19 payments YOU made associated with the residence, YOUR dates of residency, and reason for
 20 leaving.

21
 22 ANSWER:

23
 24 SEE RESPONSE TO INTERROGATORY NO. 6.
 25
 26

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1 INTERROGATORY NO. 8: IDENTIFY ALL medical (including mental health)
2 treatment YOU received that YOU claim is RELATED TO ON-SITE'S actions, including the
3 name of YOUR treating physician, dates of treatment, reason(s) for seeking treatment, diagnosis,
4 treatment plan, and prognosis.

5 ANSWER:

6
7 PLAINTIFF OBJECTS TO THIS INTERROGATORY BECAUSE DEFENDANT
8 SEEKS TO OBTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL
9 AND TO WHICH IT HAS NO LEGAL RIGHTS WHATSOEVER. PLAINTIFF
10 OBJECTS TO THIS REQUEST BECAUSE IT IS UNLIKELY TO LEAD TO THE
11 DISCOVERY OF ADMISSIBLE EVIDENCE. AS THERE IS NO LEGAL BASIS FOR
12 DEFENDANT TO OBTAIN PLAINTIFF'S MEDICAL OR MENTAL HEALTH
13 RECORDS, PLAINTIFF FURTHER OBJECTS TO THIS INTERROGATORY AS
14 BEING INTERPOSED BY DEFENDANT SOLELY FOR THE PURPOSE OF
15 HARASSMENT.

16
17 INTERROGATORY NO. 9: IDENTIFY and DESCRIBE ALL
18 COMMUNICATIONS between YOU and PALISADES between January 1, 2015 and present,
19 including the date, the representative from PALISADES, and the contents of YOUR
20 COMMUNICATION.

21 ANSWER:

22
23 AROUND JULY 28, 2015, I WENT TO PALISADES APARTMENTS AND FILED
24 AN APPLICATION FOR AN APARTMENT. THE PERSON I SPOKE WITH AT
25 PALISADES WAS A YOUNG WOMAN BUT I DO NOT REMEMBER HER NAME. I
26

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1 HAD NOT HEARD FROM PALISADES SO AFTER ABOUT A COUPLE OF DAYS OR
2 SO, I CALLED PALISADES TO FIND OUT ABOUT MY APPLICATION. I SPOKE
3 WITH THE SAME WOMAN. SHE TOLD ME THAT THERE WERE TWO ISSUES
4 THAT WERE AFFECTING THE APPLICATION. (1) THERE WAS AN ALLEGED
5 GUN CHARGE RELATED TO GLENN, JR. AND (2) THERE WAS PATRICIA ANN
6 THOMPSON'S UNLAWFUL DETAINER ACTION SHOWING UP IN THE TENANT
7 SCREENING REPORTS DONE BY ON-SITE MANAGEMENT ABOUT ME.

8 I EXPLAINED TO THIS WOMAN AT PALISADES THAT GLENN, JR. HAD A
9 GUN PERMIT WHEN HIS GUN HAD DISCHARGED ACCIDENTALLY. I THEN
10 WENT TO THE COURTHOUSE IN SEATTLE AND OBTAINED PROOF THAT
11 GLENN, JR. HAD NOT BEEN CONVICTED OF A GUN CHARGE. I GAVE THAT
12 DOCUMENTATION TO PALISADES. THE WOMAN AT PALISADES ACCEPTED
13 THAT INFORMATION/DOCUMENTATION AND TOLD ME THAT THE
14 APPLICATION STILL COULD NOT BE APPROVED BECAUSE OF PATRICIA ANN
15 THOMPSON'S UNLAWFUL DETAINER ACTION SHOWING UP IN THE TENANT
16 SCREENING REPORT THAT PALISADES HAD OBTAINED FROM ON-SITE
17 MANAGEMENT ABOUT ME. I HAVEN'T SPOKEN WITH ANYONE AT PALISADES
18 SINCE.

19
20 INTERROGATORY NO. 10: IDENTIFY and DESCRIBE ALL
21 COMMUNICATIONS between YOU and THE LODGE between January 1, 2015 and
22 present, including the date, the representative from THE LODGE, and the contents of YOUR
23 COMMUNICATION.

24 ANSWER:

25
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1 AROUND JUNE 2015, MY SON AND I WENT TO THE LODGE AND FILLED
2 OUT AN APPLICATION FOR AN APARTMENT. A COUPLE OF DAYS LATER, I
3 GOT A CALL FROM THE LODGE. I SPOKE WITH A WOMAN. I DON'T
4 REMEMBER HER NAME. SHE SAID OUR APPLICATION HAD BEEN DENIED.
5 SHE REFUSED TO SAY WHY. SHE DIDN'T GIVE US A COPY OF OUR TENANT
6 SCREENING REPORT. SHE TOLD ME TO CALL ON-SITE TO FIND OUT WHY I
7 HAD BEEN DENIED. WHEN I CALLED ON-SITE, I WAS TOLD BY A MALE
8 REPRESENTATIVE--I DON'T REMEMBER HIS NAME BUT HE WAS VERY
9 RUDE--AND HE TOLD ME THAT MY APPLICATION WAS DENIED BECAUSE OF
10 THE UNLAWFUL DETAINER ACTION FOR PATRICIA ANN THOMPSON. WHEN I
11 TOLD HIM WE DO NOT KNOW WHO PATRICIA ANN THOMPSON WAS AND WE
12 NEVER LIVED AT THAT ADDRESS, HE TOLD ME ON-SITE WOULD TAKE OUT
13 THAT INFORMATION.

14 HE THEN TOLD ME THAT I WAS ALSO BEING DENIED FOR AN AT&T
15 DEBT. I DID NOT KNOW I HAD A DEBT WITH AT&T. I WAS NOT SURE IT WAS
16 MY DEBT. I CALLED AT&T AND AFTER SEVERAL DAYS OF TRYING TO GET
17 INFORMATION FROM THEM ABOUT THE DEBT, I FINALLY DECIDED TO
18 BORROW MONEY AND PAY IT SO THAT THE APPLICATION WOULD BE
19 APPROVED. I HAD TO WAIT SEVERAL DAYS FOR AT&T TO REPORT TO ON-
20 SITE MANAGER THAT THE DEBT WAS PAID OFF. I WENT BACK TO THE
21 LODGE AND SPOKE IN PERSON TO TWO WOMEN THERE--WHOSE NAMES I
22 DON'T KNOW. I ENDED UP CALLING ON-SITE AGAIN BECAUSE I WAS
23 GETTING CONFLICTING INFORMATION FROM THE LODGE.

24 WHEN I CALLED ON-SITE AGAIN, I SPOKE WITH A WOMAN WHO TOLD
25 ME NOW THAT MY INCOME IS WHAT WAS HOLDING ME BACK. I ASKED:

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1 HOW? SINCE I HAVE A HOUSING VOUCHER. THE WOMAN AT ON-SITE TOLD
2 ME THAT THE LODGE HAD NOT SENT THAT INFORMATION TO IT ABOUT THE
3 HOUSING VOUCHER. SHE TOLD ME TO GO BACK TO THE LODGE.

4 I WENT BACK TO THE LODGE AND ASKED THE SAME WOMAN WHO
5 HAD TAKEN MY APPLICATION WHY SHE HAD NOT SENT THE INFORMATION
6 ABOUT MY HOUSING VOUCHER. SHE STRONGLY DENIED THAT SHE HAD
7 FAILED TO SEND THAT INFORMATION. I ASKED TO SPEAK TO HER
8 SUPERVISOR. THE SUPERVISOR, ANOTHER WOMAN WHOSE NAME I DO NOT
9 REMEMBER, TOLD ME THAT SHE WOULD NEED TO SPEAK TO THE FIRST
10 WOMAN I HAD SPOKEN TO AT THE LODGE SINCE SHE NEEDED TO HEAR
11 FROM HER TOO. SO THEY SPOKE WITH EACH OTHER AND CAME BACK AND
12 SAID THEY AGREED WITH EACH OTHER. I ASKED TO GET MY DEPOSIT BACK.
13 SHE SAID THERE WAS A PROTOCOL AND THAT IT WOULD TAKE ABOUT
14 THIRTY DAYS TO GET IT BACK. IT TOOK ABOUT THAT LONG TO GET THE
15 DEPOSIT BACK WHICH WAS AROUND \$400.

16
17
18 INTERROGATORY NO. 11: IDENTIFY and DESCRIBE ALL
19 COMMUNICATIONS between YOU and ON-SITE, including the date, the representative
20 from ON-SITE, and the contents of YOUR COMMUNICATION.

21 ANSWER:

22 AROUND JUNE 25, 2015, WHEN I WAS TOLD BY THE LODGE TO CALL ON-
23 SITE TO FIND OUT WHY I HAD BEEN DENIED, I DID CALL ON-SITE. I SPOKE
24 WITH A MAN—I DON'T REMEMBER HIS NAME BUT HE WAS VERY RUDE—
25 WHO TOLD ME: “YOU HAVE A PATRICIA ANN THOMPSON UNLAWFUL
26

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1 DETAINER ACTION KEEPING YOU FROM GETTING HOUSING." I TOLD THAT
2 MAN THAT I WAS NOT PATRICIA ANN THOMPSON, MY SON WAS NOT
3 PATRICIA ANN THOMPSON, AND NEITHER ONE OF US HAD EVER LIVED AT
4 2917 12th AVE S., SEATTLE, WA 98144, SO THAT EVICTION CASE HAD NOTHING
5 TO DO WITH US. HE TOLD ME THEY WOULD REMOVE THAT INFORMATION.

6
7 AFTER I TOLD HIM THAT I WASN'T PATRICIA ANN THOMPSON, HE SAID
8 WHAT WAS KEEPING ME FROM HOUSING WAS AN ACCOUNT IN
9 COLLECTIONS FROM AT&T. I WAS NOT SURE THIS ACCOUNT WAS MINE SO I
10 CALLED AT&T AND TRIED TO GET SOME INFORMATION ABOUT THIS DEBT.
11 IT TOOK SEVERAL DAYS OF TALKING TO PEOPLE AT AT&T. THEY COULDN'T
12 GIVE ME AN ANSWER. FINALLY, I GOT TIRED OF GOING AROUND SO I
13 BORROWED MONEY AND PAID THE AMOUNT. I AM NOT SURE THIS WAS MY
14 DEBT BUT I PAID IT. I HAD TO WAIT SEVERAL DAYS FOR AT&T TO TRANSFER
15 THE INFORMATION TO ON-SITE. I CALLED ON-SITE AGAIN AND THIS TIME I
16 SPOKE WITH A WOMAN. I DON'T REMEMBER HER NAME.

17 I WAS THEN TOLD THAT THE REASON I WAS STILL NOT GETTING MY
18 APPLICATION ACCEPTED IS BECAUSE I WAS NOT MAKING ENOUGH TO PAY
19 FOR THE RENT. I TOLD THAT PERSON THAT I HAD A HOUSING VOUCHER.
20 THE WOMAN TOLD ME YOU NEED TO GO BACK TO THE LODGE AND TELL
21 THEM TO SUBMIT YOUR APPLICATION WITH THE HOUSING VOUCHER
22 INFORMATION IN IT. I WENT BACK TO THE LODGE AND TOLD THE WOMAN
23 WHAT ON-SITE HAD TOLD ME. SHE INSISTED THAT THEY HAD PROVIDED
24 THE INFORMATION TO ON-SITE. THE LODGE MADE IT CLEAR I WASN'T
25 GETTING AN APARTMENT. I ASKED FOR MY DEPOSIT BACK.

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1 AROUND JULY 28, 2015, I APPLIED AT PALISADES AND WAS TOLD THAT
2 THE APPLICATION COULD NOT BE APPROVED BECAUSE OF PATRICIA ANN
3 THOMPSON'S UNLAWFUL DETAINER ACTION SHOWING UP IN THE TENANT
4 SCREENING REPORT PALISADES HAD OBTAINED FROM ON-SITE
5 MANAGEMENT.

6
7 INTERROGATORY NO. 12: Has Eric Dunn represented **YOU** in any other
8 lawsuits? If so, identify the cause number, court, date, subject matter of the lawsuit, and the
9 resolution of the lawsuit.

10 ANSWER:

11
12 NO.

13
14 INTERROGATORY NO 13: **IDENTIFY** and **DESCRIBE ALL** the facts and
15 circumstances **YOU** believe support **YOUR** allegation that **ON-SITE** was negligent in obtaining
16 information contained in **YOUR** consumer report, as alleged in Paragraph 4.A.5 of **YOUR**
17 COMPLAINT.

18 ANSWER:

19 PLAINTIFF OBJECTS TO THIS INTERROGATORY AS MISSTATING
20 PARAGRAPH 4.A.5 OF THE COMPLAINT WHICH SPECIFICALLY STATES THAT
21 ON-SITE FAILED TO FOLLOW REASONABLE PROCEDURES IN PREPARING
22 CONSUMER REPORTS AND THAT ITS IMPROPER CREDIT REPORTING
23 ACTIVITIES OCCUR WITHIN THE SCOPE OF TRADE IN MAKING TENANT-
24 SCREENING REPORTS ABOUT WASHINGTONIAN RENTAL APPLICANTS.

25
26 DEFENDANT'S FIRST INTERROGATORIES AND
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1 WITHOUT WAIVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:
2 PLAINTIFF'S POSITION IS THAT ON-SITE FAILED TO FOLLOW REASONABLE
3 PROCEDURES TO AVOID MISMATCHING UNLAWFUL RECORDS TO
4 APPLICANTS WITH SIMILAR NAMES WHEN AROUND JUNE 26, 2015, IT
5 REPORTED IN PLAINTIFF'S TENANT SCREENING REPORT AN UNLAWFUL
6 DETAINER ACTION FOR PATRICIA ANN THOMPSON—A PERSON UNKNOWN
7 TO PLAINTIFF, OF EITHER A DIFFERENT OR UNKNOWN GENDER, AND AT AN
8 ADDRESS THAT PLAINTIFF HAS NEVER LIVED AT—. ON-SITE IMPROPERLY
9 REPORTED THIS INFORMATION TO THE LODGE.

10 WHEN ON-SITE WAS INFORMED THAT PATRICIA ANN THOMPSON'S
11 RECORD HAD NOTHING TO DO WITH PLAINTIFF'S RECORD, ON-SITE
12 INFORMED PLAINTIFF THAT IT WOULD REMOVE THIS INFORMATION.
13 HOWEVER, ON-SITE AGAIN FAILED TO FOLLOW REASONABLE PROCEDURES
14 WHEN IT SENT A TENANT SCREENING REPORT TO CLUB PALISADES IN JULY
15 2015, A MONTH LATER. ON-SITE AGAIN FALSELY REPORTED TO CLUB
16 PALISADES THE UNLAWFUL DETAINER ACTION RECORD FOR PATRICIA ANN
17 THOMPSON IN THE TENANT SCREENING REPORT IT PREPARED FOR
18 PLAINTIFF.

19 FURTHER, ON-SITE HAS REPORTED ADDITIONAL INFORMATION IN
20 PLAINTIFF'S TENANT SCREENING REPORT INVOLVING JUDGMENTS AND
21 ACCOUNTS ON COLLECTION THAT PLAINTIFF DENIES ANY KNOWLEDGE OF
22 OR IN THAT IN ANY WAY ARE HIS ACCOUNTS OR A RESULT OF ANY
23 ACCOUNTS HE HAS EVER HAD.

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26
DEFENDANT'S FIRST INTERROGATORIES AND
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1
2
3 INTERROGATORY NO. 14: IDENTIFY YOUR total monthly income between
4 January 1, 2015 and August 1, 2015.

5 ANSWER:

6
7 PLAINTIFF OBJECTS TO THIS REQUEST AS BEING UNLIKELY TO LEAD
8 TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

9 WITHOUT WAVYING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:
10 MY INCOME DURING THIS TIME PERIOD WAS AROUND \$850 PER MONTH
11 IN SOCIAL SECURITY BUT I ALSO HAD A HOUSING CHOICE VOUCHER
12 THROUGH KING COUNTY HOUSING AUTHORITY, WHICH WOULD HAVE
13 SUBSIDIZED MY RENT WHEN I APPLIED FOR HOUSING IN JUNE AND JULY
14 2015.

15
16 INTERROGATORY NO. 15: IDENTIFY and DESCRIBE ALL
17 COMMUNICATIONS between YOU and Patricia A. Thompson, including the date of the
18 COMMUNICATION, including but not limited to: all PERSONS present for the
19 COMMUNICATION, and the contents of the COMMUNICATIONS.

20 ANSWER:

21
22 I DON'T KNOW WHO PATRICIA A. THOMPSON IS AND HAVE NEVER
23 SPOKEN WITH HER. HOWEVER, STAFF AT ON-SITE MIGHT KNOW SINCE IT
24 ERRONEOUSLY LISTED THIS PERSON IN THE TENANT SCREENING REPORT IT
25 CREATED IN MY NAME.

26
DEFENDANT'S FIRST INTERROGATORIES AND
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1
2
3 INTERROGATORY NO. 16: IDENTIFY and DESCRIBE ALL
4 COMMUNICATIONS between YOU and E.A. Tucci, including, but not limited to the date of
5 the COMMUNICATION, all PERSONS present for the COMMUNICATION, and the
6 contents of the COMMUNICATION.

7 ANSWER:

8
9 I HAVE NEVER MET OR HAD ANY COMMUNICATION WITH E.A. TUCCI. I
10 DON'T KNOW WHO E.A. TUCCI IS. HOWEVER, STAFF AT ON-SITE MIGHT
11 KNOW WHO E.A. TUCCI IS SINCE ON-SITE ERRONEOUSLY LISTED THIS
12 PERSON AS IN THE TENANT SCREENING REPORT IT CREATED IN MY NAME.

13
14
15 REQUESTS FOR PRODUCTION

16 REQUEST FOR PRODUCTION NO. 1: Produce ALL DOCUMENTS

17 RELATED TO or used in preparing YOUR response to Interrogatory No. 1 including, but not
18 limited to: ALL COMMUNICATIONS between YOU and the BANK and ALL BANK
19 statements for ALL accounts that YOU have held for the last five (5) years.

20 ANSWER:

21
22 PLAINTIFF OBJECTS TO THIS REQUEST AS BEING UNDULY
23 BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE
24 EVIDENCE.
25

26
DEFENDANT'S FIRST INTERROGATORIES AND
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REQUEST FOR PRODUCTION NO. 2:Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 2 including, but not limited to: **ALL YOUR** credit card statements from the last five (5) years, as well as **ALL** notifications and/or **COMMUNICATIONS** between **YOU** and any credit card company(ies) from the last five (5) years.

ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS BEING UNDULY BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

REQUEST FOR PRODUCTION NO. 3:Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 3 including but not limited to: **ALL** credit reports run by **YOU**, on **YOUR** behalf, or by a third-party (including **ALL** residential complexes).

ANSWER:

PLAINTIFF OBJECT TO THIS REQUEST AS BEING UNDULY BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

REQUEST FOR PRODUCTION NO. 4:Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 4 including, but not limited to: **ALL COMMUNICATIONS**, bills, invoices, notifications, past due notices, pleadings, judgments, garnishments, or **ALL** other documentation **RELATED TO a DEBT.**

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ANSWER:

**PLAINTIFF OBJECTS TO THIS REQUEST AS BEING UNDULY
BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE
EVIDENCE.**

REQUEST FOR PRODUCTION NO. 5: Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 5 including, but not limited to: **ALL** pleadings, notices, writs, judgments, deeds, or other documentation **RELATED TO ALL** judgments, liens or garnishments.

ANSWER:

**PLAINTIFF OBJECTS TO THIS REQUEST AS UNLIKELY TO LEAD TO THE
DISCOVERY OF ADMISSIBLE EVIDENCE, UNDULY BURDENSOME, AND MORE
EASILY OBTAINABLE THROUGH COURT INFORMATION SYSTEMS.**

WITHOUT WAIVING THIS OBJECTION, PLAINTIFF STATES AS FOLLOWS:

**I DO NOT REMEMBER BEING SERVED WITH A NOTICE OF ANY ACTION
RELATED TO A JUDGMENT OR NOTICE OF ANY JUDGMENT IN THE LAST TEN
YEARS.**

REQUEST FOR PRODUCTION NO. 6: Produce **ALL DOCUMENTS**

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 6 including but not limited to: **ALL** rental applications, **ALL COMMUNICATIONS** between **YOU** and **ALL** residential complexes, and **ALL** reports run by or on behalf of **ALL** residential complexes **RELATED TO YOUR** application (including **ALL** consumer reports).

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ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

WITHOUT WAIVING THE OBJECTION,

SEE ATTACHED DOCUMENTS LISTED AS "I", II, III, IV, and VII.

SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED AS:

"CONFIDENTIAL": OSMTOOOO019 - 20, 34 -36, 53-82

REQUEST FOR PRODUCTION NO. 7: Produce ALL DOCUMENTS

RELATED TO or used in preparing YOUR response to Interrogatory No. 7 including, but not
limited to: ALL lease agreements, rental agreements, rental checks, and ALL
COMMUNICATIONS RELATED TO ALL lease agreements, rental agreements, or rent
payments.

ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

WITHOUT WAIVING THE OBJECTION:

SEE ATTACHED DOCUMENTS LISTED AS "II".

SEE ALSO REQUEST FOR PRODUCTION #6.

REQUEST FOR PRODUCTION NO. 8: Produce ALL DOCUMENTS

RELATED TO or used in preparing YOUR response to Interrogatory No. 8 including, but not

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1 limited to: ALL medical records, COMMUNICATIONS, prescriptions, written
2 recommendations, treatment plans, and ALL other DOCUMENTS related to ALL medical
3 treatment obtained by YOU between January 1, 2015 and present.

4 ANSWER:

5
6 PLAINTIFF OBJECTS TO THIS REQUEST BECAUSE DEFENDANT SEEKS
7 TO OBTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL AND TO
8 WHICH IT HAS NO LEGAL RIGHTS WHATSOEVER. PLAINTIFF OBJECTS TO
9 THIS REQUEST AS IT IS UNLIKELY TO LEAD TO THE DISCOVERY OF
10 ADMISSIBLE EVIDENCE. AS THERE IS NO LEGAL BASIS FOR DEFENDANT TO
11 OBTAIN PLAINTIFF'S MEDICAL OR MENTAL HEALTH RECORDS, PLAINTIFF
12 FURTHER OBJECTS TO THIS REQUEST AS BEING INTERPOSED BY DEFENDANT
13 SOLELY FOR THE PURPOSE OF HARASSMENT.

14
15
16 REQUEST FOR PRODUCTION NO. 9:

Produce ALL DOCUMENTS

17 RELATED TO or used in preparing YOUR response to Interrogatory No. 9 including, but not
18 limited to: ALL COMMUNICATIONS, ALL notes taken by you RELATED TO ALL
19 COMMUNICATIONS, letters, reports, or other DOCUMENTS YOU received from
20 PALISADES.

21 ANSWER:

22
23 SEE RESPONSE TO REQUEST FOR PRODUCTION NO. 6.
24
25
26

DEFENDANT'S FIRST INTERROGATORIES AND
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1 REQUEST FOR PRODUCTION NO. 10: Produce ALL DOCUMENTS

2 **RELATED TO** or used in preparing **YOUR** response to Interrogatory No. 10 including, but not
3 limited to: **ALL COMMUNICATIONS**, **ALL** notes taken by **YOU RELATED TO ALL**
4 **COMMUNICATIONS**, letters, reports, or other **DOCUMENTS YOU** received from **THE**
5 **LODGE**.

6 ANSWER:

7
8 ALL COMMUNICATION WITH THE LODGE WAS EITHER BY PHONE OR
9 IN PERSON. SEE ALSO RESPONSE TO REQUEST NO. 6.

10
11
12 REQUEST FOR PRODUCTION NO. 11: Produce ALL DOCUMENTS

13 **RELATED TO** or used in preparing **YOUR** response to Interrogatory No. 11 including, but not
14 limited to: **ALL COMMUNICATIONS** between **YOU** and **ON-SITE**; **ALL** notes
15 **REGARDING COMMUNICATIONS** between **YOU** and **ON-SITE**; **ALL** letters from or to
16 **ON-SITE**; **ALL** reports from **ON-SITE**; and **ALL DOCUMENTS RELATED TO** or that
17 **YOU** received from **ON-SITE**.

18 ANSWER:

19
20 SEE ATTACHED DOCUMENTS LISTED AS I, III, IV, AND VII.

21 SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED AS:

22 "CONFIDENTIAL": OSMTOOOO19 - 20, 34 -36, 53-82

23
24
25
26 DEFENDANT'S FIRST INTERROGATORIES AND
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REQUEST FOR PRODUCTION NO. 12:

Produce ALL DOCUMENTS

RELATED TO or used in preparing **YOUR** response to Interrogatory No. 13, including, but not limited to: **ALL DOCUMENTS** that **YOU** claim support **YOUR** allegation that **ON-SITE** was negligent.

ANSWER:

SEE ATTACHED DOCUMENTS LISTED AS I, II, IV AND VII.

SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED AS:

"CONFIDENTIAL": OSMTOOOO19 - 20, 34 -36, 53-60

REQUEST FOR PRODUCTION NO. 13:

Produce ALL medical (including

mental health) records **RELATED TO** ALL medical treatment **YOU** claim is **RELATED TO ON-SITE'S** alleged actions.

ANSWER:

PLAINTIFF OBJECTS TO THIS REQUEST BECAUSE DEFENDANT SEEKS TO OBTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL AND TO WHICH IT HAS NO LEGAL RIGHTS WHATSOEVER. PLAINTIFF OBJECTS TO THIS REQUEST AS IT IS UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE. AS THERE IS NO LEGAL BASIS FOR DEFENDANT TO OBTAIN PLAINTIFF'S MEDICAL OR MENTAL HEALTH RECORDS, PLAINTIFF FURTHER OBJECTS TO THIS REQUEST AS BEING INTERPOSED BY DEFENDANT SOLELY FOR THE PURPOSE OF HARASSMENT.

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1 REQUEST FOR PRODUCTION NO. 14: Produce ALL DOCUMENTS
2 RELATED TO ALL efforts by YOU to mitigate YOUR damages, including, but not limited to:
3 ALL rental applications filed by YOU between January 1, 2015 and present and ALL
4 documents RELATED TO ALL housing YOU attempted to obtain between January 1, 2015
5 and present.

6 ANSWER:

7
8 PLAINTIFF OBJECTS TO THIS REQUEST BECAUSE IT IS BROAD AND
9 UNDULY BURDENSOME AND OUTSIDE OF THE SCOPE OF THIS LITIGATION
10 TO THE EXTENT THAT IT IS ASKING FOR DOCUMENTATION OR
11 INFORMATION THAT PREDATES JUNE 2015.

12
13 WITHOUT WAIVING THIS OBJECTION, SEE ATTACHED DOCUMENTS
14 LISTED AS I, II, III, IV, and V.

15
16
17 REQUEST FOR PRODUCTION NO. 15: Produce ALL copies of YOUR
18 attorney bills RELATED TO this lawsuit.

19 ANSWER:

20
21 I AM REPRESENTED BY THE NORTHWEST JUSTICE PROJECT WHICH
22 PROVIDES FREE LEGAL ASSISTANCE TO LOW INCOME WASHINGTONIANS.
23 THAT DOES NOT MEAN, HOWEVER, THAT THE COURT CANNOT GRANT ME
24 ATTORNEY FEES AND COSTS IN THIS LITIGATION.
25

26
DEFENDANT'S FIRST INTERROGATORIES AND
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1 **REQUEST FOR PRODUCTION NO. 16:** Produce **ALL COMMUNICATIONS**

2 **YOU** received from a **DEBT** collector regarding a past due **DEBT** within the last five (5) years,
3 including, but not limited to: **COMMUNICATIONS** between **YOU** and Enhanced Recovery
4 Collections, Lamont Hanley & Associates, AllianceOne Receivable Management, Inc., and EOS
5 CCA.

6 **ANSWER:**

7
8 **PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND**
9 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

10 **WITHOUT WAIVING THIS OBJECTION, PLAINTIFF ANSWERS AS**
11 **FOLLOWS:**

12 **TO PLAINTIFF'S KNOWLEDGE HE HAS NEVER BEEN CONTACTED BY**
13 **ENHANCED RECOVERY COLLECTIONS, LAMONT HANLEY & ASSOCIATES,**
14 **ALLIANCEONE RECEIVABLE MANAGEMENT, INC., OR EOS CCA.**
15 **AT PLAINTIFF'S INITIATIVE AFTER BEEN TOLD BY ON-SITE**
16 **MANAGEMENT ABOUT A DEBT, HE CONTACTED AT&T REGARDING DEBT**
17 **ALLEGED BY ENHANCED RECOVERY COLLECTIONS. SEE ATTACHED**
18 **DOCUMENTS LISTED AS V.**

19
20
21 **REQUEST FOR PRODUCTION NO. 17:** Produce **ALL DOCUMENTS**

22 **RELATED TO YOUR** income between January 1, 2015 and August 1, 2015.

23 **ANSWER:**

24
25
26 **DEFENDANT'S FIRST INTERROGATORIES AND**
 REQUESTS FOR PRODUCTION TO PLAINTIFF
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1 PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
2 UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

3
4 WITHOUT WAVING THIS OBJECTION, SEE ATTACHED DOCUMENTS
5 LISTED AS VI.

6
7 REQUEST FOR PRODUCTION NO. 18: Produce ALL DOCUMENTS
8 RELATED TO ALL COMMUNICATIONS between YOU and Patricia A. Thompson,
9 including, but not limited to: ALL letters, notes, notices, or records of telephone conversations.

10 ANSWER:
11
12 SEE PLAINTIFF'S RESPONSE TO INTERROGATORY 15.

13
14 REQUEST FOR PRODUCTION NO. 19: Produce ALL DOCUMENTS
15 RELATED TO ALL COMMUNICATIONS between YOU and E.A. Tucci, including, but not
16 limited to: ALL letters, notes, notices, or records of telephone conversations.

17 ANSWER:
18
19 SEE PLAINTIFF'S RESPONSE TO INTERROGATORY 16.

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DEFENDANT'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO PLAINTIFF
GLENN THOMPSON, SR. Page- 28
(2:15-CV-01596-TSZ)

GORDON & REES LLP
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: (206) 695-5100
Facsimile: (206) 689-2822

1 **REQUEST FOR PRODUCTION NO. 20:** Produce ALL DOCUMENTS

2 **RELATED TO any DEBT YOU owe/owed to:** T-Mobile, CenturyLink Qwest Corporation,
3 Kent, Seattle, Coast National Insurance Company, and AT&T.

4 **ANSWER:**

5
6 PLAINTIFF OBJECTS TO THIS REQUEST AS VAGUE, UNDULY
7 BURDENSOME AND UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE
8 EVIDENCE. AMONG OTHER OBJECTIONABLE FACTORS, PLAINTIFF OBJECTS
9 BECAUSE THE REQUEST DOES NOT SET A TIME LIMIT AND DOES NOT
10 IDENTIFY WHICH COMPANY IN KENT OR SEATTLE IT IS REFERRING TO.
11 WITHOUT WAIVING THE OBJECTION, SEE DOCUMENTS ATTACHED AS
12 V—LISTING A DEBT ALLEGED BY ON-SITE MANAGEMENT THAT WAS PAID BY
13 PLAINTIFF.

14
15 **REQUEST FOR PRODUCTION NO. 21:** Produce ALL DOCUMENTS

16 **RELATED TO YOUR** account with DSHS/DCS Olympia for Family Support.

17 **ANSWER:**

18
19 PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
20 UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.

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26 DEFENDANT'S FIRST INTERROGATORIES AND
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GORDON & REES LLP
 701 5th Avenue, Suite 2100
 Seattle, WA 98104
 Telephone: (206) 695-5100
 Facsimile: (206) 689-2822

1 **REQUEST FOR PRODUCTION NO. 22:** Produce ALL DOCUMENTS

2 **RELATED TO YOUR** account with Ray Klein Inc.

3 **ANSWER:**

4
5 PLAINTIFF OBJECTS TO THIS REQUEST AS UNDULY BURDENSOME AND
6 **UNLIKELY TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE.**

7
8 **WITHOUT WAVING THIS OBJECTION, I HAVE NEVER HAD AN ACCOUNT**
9 **WITH RAY KLEIN INC. OR RECEIVED ANY DOCUMENTATION FROM RAY**
10 **KLEIN, INC.**

11
12 **REQUEST FOR PRODUCTION NO. 23:** Produce ALL DOCUMENTS YOU
13 claim support **YOUR** allegation that **ON-SITE'S** report that **YOU** were sued for unlawful
14 detainer in 2011 "caused or substantially contribute the denial of the plaintiffs' rental application
15 at [THE LODGE]" as alleged in Paragraph 4.A.1 of **YOUR COMPLAINT.**

16 **ANSWER:**

17
18 **ALL THE COMMUNICATION WITH THE LODGE WAS IN PERSON OR BY**
19 **TELEPHONE.**

20 **WITHOUT WAVING THIS OBJECTION, SEE RESPONSE TO REQUEST FOR**
21 **PRODUCTION NO. 6.**

22
23 DEFENDANT'S FIRST INTERROGATORIES AND
24 REQUESTS FOR PRODUCTION TO PLAINTIFF
25 GLENN THOMPSON, SR. Page- 30
26 (2:15-CV-01596-TSZ)

GORDON & REES LLP
 701 5th Avenue, Suite 2100
 Seattle, WA 98104
 Telephone: (206) 695-5100
 Facsimile: (206) 689-2822

1 **REQUEST FOR PRODUCTION NO. 24:** Produce **ALL DOCUMENTS YOU**
2 claim support **YOUR** allegation that “[ON-SITE] failed to establish or follow reasonable
3 procedures to avoid improperly attributing unlawful detainer case records to rental applications”
4 as alleged in Paragraph 4.A.2 of **YOUR COMPLAINT**.

5 **ANSWER:**

6
7 **SEE DOCUMENTS ATTACHED AS I, III, AND IV.**
8

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12 **REQUEST FOR PRODUCTION NO. 25:** Produce **ALL DOCUMENTS YOU**

13 claim support **YOUR** allegation that “[ON-SITE] failed to follow reasonable procedures to
14 assure the maximum possible accuracy of the consumer reports it prepared about plaintiffs and
15 sent to Club Palisades in July 2015” as alleged in Paragraph 4.A.3 of **YOUR COMPLAINT**.

16 **ANSWER:**

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18 **SEE DOCUMENTS ATTACHED AS I, III, AND IV.**
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DEFENDANT'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO PLAINTIFF
GLENN THOMPSON, SR. Page- 31
(2:15-CV-01596-TSZ)

GORDON & REES LLP
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: (206) 695-5100
Facsimile: (206) 689-2822

1 **REQUEST FOR PRODUCTION NO. 26:** Produce **ALL DOCUMENTS YOU**
2 claim support **YOUR** allegation that **ON-SITE'S** "failure to follow reasonable
3 procedures...resulted in On-Site falsely reporting...to a residential landlord Club Palisades, that
4 plaintiffs had been sued for unlawful detainer in 20011 and had a judgment entered against them.
5 This improper report caused or substantially contributed to the denial of plaintiffs' rental
6 application at Club Palisades" as alleged in Paragraph 4.A.3 of **YOUR COMPLAINT**.

7 **ANSWER:**

8
9 **SEE DOCUMENTS ATTACHED AS I, III, IV, AND VII.**

10
11 **REQUEST FOR PRODUCTION NO. 27:** Produce **ALL DOCUMENTS YOU**
12 claim support **YOUR** allegation that "On-Site's failure to follow reasonable procedures to avoid
13 mismatching unlawful detainer record to applications with similar names as the actual defendants
14 was willful. If not willful, it was at least negligent" as alleged in Paragraph 4.A.5 of **YOUR**
15 **COMPLAINT**.

16 **ANSWER:**

17
18 **SEE DOCUMENTS ATTACHED AS I, III, IV, AND VII.**

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DEFENDANT'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO PLAINTIFF
GLENN THOMPSON, SR. Page- 32
(2:15-CV-01596-TSZ)

GORDON & REES LLP
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: (206) 695-5100
Facsimile: (206) 689-2822

1 **REQUEST FOR PRODUCTION NO. 28:** Produce **ALL DOCUMENTS YOU**

2 claim support **YOUR** allegation that “On-Site’s failure to properly reinvestigate the plaintiffs’
3 consumer disputes, delete or correct improper information, or make required to disclosure to the
4 plaintiffs or relevant third-parties (such as The Lodge or Club Palisades) prevented [the
5 plaintiffs] from obtaining rental housing at The Lodge or Club Palisades or other properties that
6 use On-Site for tenant screening” as alleged in Paragraph 4.A.8 of **YOUR COMPLAINT**.

7 **ANSWER:**

8
9 **SEE DOCUMENTS ATTACHED AS I, III, IV, AND VII.**

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12 **REQUEST FOR PRODUCTION NO. 29:** Produce **ALL DOCUMENTS YOU**

13 claim support **YOUR** allegation that “On-Site’s failures to properly reinvestigate the plaintiffs’
14 consumer disputes, delete or correct improper information, or make required to [sic] disclosures
15 to Plaintiffs or relevant third-parties (such as The Lodge or Club Palisades) were willful. If not
16 willful, these violations were at least negligent” as alleged in Paragraph 4.A.10 of **YOUR**
17 **COMPLAINT**.

18 **ANSWER:**

19
20 **SEE DOCUMENTS ATTACHED AS I, III, IV, AND VII.**

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26 DEFENDANT’S FIRST INTERROGATORIES AND
 REQUESTS FOR PRODUCTION TO PLAINTIFF
 GLENN THOMPSON, SR. Page- 33
 (2:15-CV-01596-TSZ)

GORDON & REES LLP
 701 5th Avenue, Suite 2100
 Seattle, WA 98104
 Telephone: (206) 695-5100
 Facsimile: (206) 689-2822

1 **REQUEST FOR PRODUCTION NO. 30:** Produce **ALL DOCUMENTS YOU**
2 claim support **YOUR** claim for actual damages, as alleged in Paragraph 5.1.c of **YOUR**
3 **COMPLAINT**, including **ALL** receipts, letters, notifications, communications, notes, bills,
4 invoices, or other **DOCUMENTS YOU** claim show damages **RELATED TO ON-SITE'S**
5 alleged violations of Fair Credit Reporting Act and Washington Fair Credit Reporting Act.

6 **ANSWER:**

7
8 **SEE DOCUMENTS ATTACHED AS I, III, IV, AND VII.**

9 **SEE ALSO SEE ALSO DOCUMENTS IN DEFENDANT'S CONTROL LISTED**

10 **AS: "CONFIDENTIAL": OSMTOOOO019 - 20, 34 -36, 53-60.**
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DEFENDANT'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO PLAINTIFF
GLENN THOMPSON, SR. Page- 34
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GORDON & REES LLP
701 5th Avenue, Suite 2100
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Telephone: (206) 695-5100
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VERIFICATION

I, Glenn Thompson, Sr., am the Plaintiff in the above-entitled action. I have read Plaintiff's responses to Defendant's First Interrogatories and Requests for Production to Plaintiff Glenn Thompson, Sr., know the contents thereof, and believe the same to be true.

DATED this 1st day of April, 2016.


Glenn Thompson, Sr.

DEFENDANT'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO PLAINTIFF
GLENN THOMPSON, SR. Page- 35
(2:15-CV-01596-TSZ)

GORDON & REES LLP
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Seattle, WA 98104
Telephone: (206) 695-5100
Facsimile: (206) 689-2822

ATTORNEY CERTIFICATION

Pursuant to FRCP 26(g), I certify that I have read Plaintiff's responses to Defendant's First Interrogatories and Requests for Production to Plaintiff Glenn Thompson, Sr., including all answers, responses, and objections, and to the best of my knowledge, information and belief, formed after a reasonable inquiry, such answers, responses, and objections are (1) consistent with the Federal Rules of Civil Procedure by existing law; (2) not interposed for any improper purpose, such as to harass or cause unnecessary delay or needless increase in the cost of litigation; and (3) not unreasonably or unduly burdensome or expansive given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation.

DATED this 18th day of April, 2016.

By: 

Eric Dunn, WSBA #36622
Allyson O'Malley-Jones, WSBA #31868
Leticia Camacho, WSBA #31341
Northwest Justice Project
Attorneys for Plaintiffs

DEFENDANT'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO PLAINTIFF
GLENN THOMPSON, SR. Page- 36
(2:15-CV-01596-TSZ)

GORDON & REES LLP
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: (206) 695-5100
Facsimile: (206) 689-2822

Rental Report for GLENN P. THOMPSON, Sr., 7/28/2015 for 69-103 at Club Palisades

Rental Report for GLENN P. THOMPSON, Sr.**Overall Recommendation****DECLINE**

This application does not meet one or more of your requirements that is set to "Pass/Fail". This recommendation has been automatically set to Decline. The Overall Recommendation was derived solely from your community's leasing criteria. On-Site makes no independent assessment of an applicant's qualifications.

Application **Rejected** by Yajayra Andrade on 8/4/2015.

Score for GLENN P. THOMPSON, Sr.: DECLINE

	Importance	Pass	Fail
Total monthly income to rent ratio exceeds 2.5	Pass/Fail		✓
Gross monthly income after rent and estimated debt exceeds 0.5 times the monthly rent	Pass/Fail	✓	
Has not had an employment verification that is false, negative or unable to verify	Pass/Fail	✓	
Maximum percentage of past due negative accounts is less than 33.0%	Moderately		✓
Unpaid collections and grossly delinquent past due balances do not exceed \$2,000.00	Very	✓	
May have been through a bankruptcy	Pass/Fail	✓	
No Landlord Tenant Court records or unpaid landlord collections	Pass/Fail	✓	
Had not had a rental history verification that is false, negative or unable to verify	Pass/Fail	✓	
Has not had any misdemeanor convictions	Pass/Fail	✓	
Has not had any felony convictions	Pass/Fail	✓	
Is not a registered sex offender	Pass/Fail	✓	

This report does not guarantee the accuracy or truthfulness of the information as to the subject of the investigation, but only that it is accurately copied from public records, and information generated as a result of identity theft, including evidence of criminal activity, may be inaccurately associated with the consumer who is the subject of the report. An applicant who is the subject of this report may obtain a free copy at any time by contacting On-Site Renter Relations. *El solicitante que es objeto de este informe puede obtener una copia gratuita por contactar On-Site Renter Relations.*

WARNINGS**APPLICANT: Inquiry/On-File Current Address Conflict (Experian)**

The applicant's address does not match the address on record with the credit bureau. This could indicate fraudulent activity; you should verify that the address supplied is valid. Before proceeding you must verify that the information in the report relates to the actual applicant in question as required under FCRA Section 605(h). Review our bulletin for information on compliance.

SPECIAL CONDITION: income to rent ratio

On-Site.com identified an income to rent ratio that failed on this report. This recommendation has been automatically set to Decline.



Rental Report for GLENN P. THOMPSON, Sr., 7/28/2015 for 69-103 at Club Palisades

Credit Quick Summary**Custom scoring for this report:**

Payment history beyond 24 months not considered
Accounts with 2 30-day late payment or less are not considered negative
Do not consider mortgages in default.

Medical collections not considered
Accounts with less than \$100.00 past due are not considered negative

Student loans not considered
Do not consider foreclosures.

Total monthly income (reported by Applicant)	\$920.00	
Total verified monthly income	\$920.00	
Total monthly income to rent ratio	2.07 (based on rent of \$1,288.00)	
Estimated monthly debt and rent payments	\$693.05 (108% of monthly rent)	
Total number of accounts	1	
Accounts with no late payments	1 (0 unpaid past due)	
Accounts paid 30-59 days past due	0 (0 unpaid past due)	
Accounts paid 60-89 days past due	0 (0 unpaid past due)	
Accounts paid more than 90 days past due	0 (0 unpaid past due)	
Total outstanding balance	\$0.00 (\$0.00 past due)	
Outstanding revolving debt	\$0.00 (0% of limit) (\$0.00 past due)	
Outstanding loan balance	\$0.00 (\$0.00 past due)	
Bankruptcies, foreclosures, and legal items	1	
Collection total balance (includes past due)	\$970.00	
Landlord tenant court records found	0	

Identity	From Application	From Experian
Name:	GLENN P. THOMPSON, Sr.	GLENN THOMPSON PATRICK THOMPSON
SSN:		
Birth Date:		

Addresses	From Application	From Experian
	9681 54TH AVE S SEATTLE, WA 98118 - US	6105 S 124TH ST. SEATTLE, WA 98178-3543 (Applicant) Reported 5/2010 59TH AVE S SEATTLE, WA 98178 (Applicant) Reported 11/2006 11273 59TH AVE S SEATTLE, WA 98178-2943 (Applicant) Reported 3/2006

Employment	From Application	From Experian
Applicant:	SSI SSI \$920.00/Mo. Total monthly Income: \$920.00	T I ENTERPRISE

Rental Report for GLENN P. THOMPSON, Sr., 7/28/2015 for 69-103 at Club Palisades

Verifications**Address: 9681 54TH AVE S**

Requested For GLENN P. THOMPSON, Sr. Requested Date 7/28/2015	Landlord from Application	Address	Prior Rent
	FRANCES CANNON (206) 721-3584	9681 54TH AVE S SEATTLE, WA 98118 - US	\$300.00
	Results	Contact	Verified Rent
	Verified Correct	FRANCES CANNON (Owner)	\$300.00/Month
	Date Started Occupancy	Late Notices	NSF Checks
	3/2015	0	0
	Account Standing	Delinquency	Would Rent Again?
	paid in full	Prompt Payer	Would Rent Again
	Any Damages Documented?	Any complaints regarding noise, pets or parking?	Pets in the Unit?
	No Damages Documented	No Complaints Documented	No
	Bed Bugs?	Applicant's Name on the Lease?	Lease Expiration Date
	No	Yes	Month-to-month
	Applicant is a Current Resident?	Applicant Notice Given?	
	Yes	Yes	
Comments From On-Site.com 7/30 1:23 PM PDT (AN) - Verbally verified correct. 7/29 3:05 PM PDT (RB) - Called reference, person who answered stated office was closed today and said to call back tomorrow. 7/29 3:05 PM PDT (RB) - *Please Note: Landlord/tenant court record, housing court lawsuit, or landlord collection found*			

Employer: SSI

Requested For GLENN P. THOMPSON, Sr. Requested Date 7/28/2015	Position Held	Monthly Salary	Supervisor
	SSI SSI	\$920.00	SSI
	Results	Contact	Verified Monthly Salary
	Verified Correct	Social Security Award Letter (see comments)	\$920.00
Comments From On-Site.com 7/30 1:06 PM PDT (AN) - Verified correct from Award Letter on file. 7/30 1:06 PM PDT (AN) - *Social Security Award Letter on file* 7/29 3:07 PM PDT (RB) - To verify SSI, we will need the most recent award letter or 2014 year tax return that shows income source.			

Criminal History**From On-Site.com**

Requested For GLENN P. THOMPSON, Sr.	Location Searched (Insight America) Multi-State: AK, AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	Period Searched 7/28/2008 - 7/28/2015	Requested 7/28/2015	Returned 7/28/2015
Results No Records Found				

National Sex Offender Registry History**From On-Site.com**

Requested For GLENN P. THOMPSON, Sr.	Date Requested 7/28/2015	Date Returned 7/28/2015
Results No Records Found		

Landlord Tenant Court Records**From On-Site.com**

There were no previous Landlord Tenant Court records found.



Rental Report for GLENN P. THOMPSON, Sr., 7/28/2015 for 69-103 at Club Palisades

OFAC SDN/Terrorist Watchlist Search**From On-Site.com**

Requested For GLENN P. THOMPSON, Sr.	Results No records found	Returned 7/28/2015
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Collections**From Experian**

Client Name TMOBILE (Applicant) Collection Agency - ENHANCED RECOVERY CO L 8014 BAYBERRY RD, JACKSONVILLE, FL 32256 (800) 496-8941	Date 3/2014	Last Active	Orig. Amount \$301.00	Balance \$301.00
Comments ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name CENTURYLINK QWEST CORPORATION (Applicant) Collection Agency - EOS CCA PO BOX 981008, BOSTON, MA 02298	Date 10/2014	Last Active	Orig. Amount \$216.00	Balance \$216.00
Comments ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name KENT (Applicant) Collection Agency - ALLIANCEONE RECEIVABLE 6565 KIMBALL DR, GIG HARBOR, WA 98335 (800) 456-8838	Date 8/2013	Last Active	Orig. Amount \$209.00	Balance \$209.00
Comments ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name SEATTLE (Applicant) Collection Agency - ALLIANCEONE RECEIVABLE 6565 KIMBALL DR, GIG HARBOR, WA 98335 (800) 456-8838	Date 5/2010	Last Active	Orig. Amount \$130.00	Balance \$130.00
Comments ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name SEATTLE (Applicant) Collection Agency - ALLIANCEONE RECEIVABLE 6565 KIMBALL DR, GIG HARBOR, WA 98335 (800) 456-8838	Date 5/2009	Last Active	Orig. Amount \$74.00	Balance \$74.00
Comments ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name COAST NATIONAL INSURANCE COM (Applicant) Collection Agency - LAMONT HANLEY & ASSOCI 1138 ELM ST, MANCHESTER, NH 03101 (603) 625-5547	Date 9/2011	Last Active	Orig. Amount \$51.00	Balance \$51.00
Comments ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name AT T (Applicant) Collection Agency - ENHANCED RECOVERY CO L 8014 BAYBERRY RD, JACKSONVILLE, FL 32256 (800) 496-8941	Date 11/2014	Last Active	Orig. Amount \$958.00	Balance \$0.00
Comments ACCOUNT LEGALLY PAID IN FULL FOR LESS THAN THE FULL BALANCE				

From Experian

Credit Accounts

From Experian

Previous Credit Inquiries

From Experian

6/2015	ON-SITE MANAGER INC (Applicant)
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Para informacion en espanol, visite www.consumerfinance.gov/learnmore o escribe a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness and privacy of information in the files of consumer reporting agencies (CRA's). There are many types of CRA's, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. **For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.**

You may have additional rights under Maine's FCRA, Me. Rev Stat. Ann. 10, Sec 1311 et seq.

- **You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address and phone number of the agency that provided the information.

- **You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a CRA (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:

- A person has taken adverse action against you because of information in your credit report;
- You are the victim of identify theft and place a fraud alert in your file;
- Your file contains inaccurate information as a result of fraud;
- You are on public assistance;
- You are unemployed but expect to apply for employment within 60 days.

In addition, by September 2005 all consumers will be entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty CRA's. See www.consumerfinance.gov/learnmore for additional information.

- **You have the right to ask for a credit score.** Credit scores are numerical summaries of your credit worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

- **You have the right to dispute incomplete or inaccurate information.** If you identify information in your file that is incomplete or inaccurate and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See www.consumerfinance.gov/learnmore for an explanation of dispute procedures.

- **CRA's must correct or delete inaccurate, incomplete or unverifiable information.** Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.

- **CRA's may not report outdated negative information.** In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

- **Access to your file is limited.** A CRA may provide information about you only to people with a valid need – usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.

- **You must give your consent for reports to be provided to employers.** A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.consumerfinance.gov/learnmore.

- **You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.** Unsolicited "prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-567-8688.

- **You may seek damages from violators.** If a CRA, or, in some cases, a user of consumer reports or a furnisher of information to a CRA violates the FCRA, you may be able to sue in state or federal court.

- **Identity theft victims and active duty military personnel have additional rights.** For more information, visit www.consumerfinance.gov/learnmore.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact::

TYPE OF BUSINESS:	CONTACT:
1.a. Banks, saving associations, and credit unions with total assets of over \$10 billion and their affiliates. b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to Bureau:	a. Bureau of Consumer Financial Protection 1700 G Street NW Washington, DC 20006 b. Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357
2. To the extent not included in item above: a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations d. Federal Credit Unions	a. Office of the Comptroller of the Currency- Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050 b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480 c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106 d. National Credit Union Administration - Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314
3. Air carriers	Asst. General Counsel for Aviation Enforcement & Proceedings Department of Transportation 400 Seventh Street SW Washington, DC 20590
4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 1925 K Street NW Washington, DC 20423
5. Creditors Subject to Packers and Stockyards Act	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 406 Third Street, SW, 8th Floor Washington, DC 20416
7. Brokers and Dealers	Securities & Exchange Commission 100 F St NE Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357

Washington State Applicant Addendum to: A Summary of Your Rights Under the Fair Credit Reporting Act

The Washington Fair Credit Reporting Act (“WFCRA”), located at Chapter 19.182 RCW, substantially parallels the federal Fair Credit Reporting Act and the rights and remedies set forth in the attached Summary of Rights, except that, effective July 22, 2007, the Washington State law imposes greater limitations on the reasons for which an employer may obtain a consumer report. Specifically, an employer may not obtain a consumer report that indicates the consumer’s credit worthiness, credit standing, or credit capacity, unless (1) the information is substantially job related and the employer’s reasons for using the information are disclosed in writing, or (2) the information is required by law.

Individuals may bring legal action in court to assert their rights under the WFCRA. The applicable statute of limitations is specified in Wash. Stat. § 19.182.120 and is generally two years from the date the cause of action accrued. Individuals who prevail on claims to enforce the WCFRA may obtain actual damages, monetary penalties, reasonable attorneys’ fees, costs, and other relief.

For any questions, concerns or complaints regarding the WFCRA, you may contact the Attorney General for the State of Washington using the following information.

Main Office Telephone:

- (360) 753-6200

Division of Consumer Protection Telephone:

- (800) 551-4636 (in-state callers only)
- (800) 833-6388 (Washington State Relay Service for the hearing impaired)
- (206) 464-6684 (out-of-state callers)

Main Office Address:

1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100

Division of Consumer Protection Address:

Bellingham	Seattle	Vancouver
103 E. Holly Suite 308	800 5 th Ave, Suite 2000	1220 Main St, Suite 549
Bellingham, WA 98225	Seattle, WA 98104-3188	Vancouver, WA 98660-2964

Rental Report for GLENN P. THOMPSON, Jr., 7/28/2015 for 69-103 at Club Palisades

Rental Report for GLENN P. THOMPSON, Jr.**Overall Recommendation****DECLINE**

This application does not meet one or more of your requirements that is set to "Pass/Fail". This recommendation has been automatically set to Decline. The Overall Recommendation was derived solely from your community's leasing criteria. On-Site makes no independent assessment of an applicant's qualifications.

Application **Rejected** by Yajayra Andrade on 8/4/2015.

Score for GLENN P. THOMPSON, Jr.: DECLINE

	Importance	Pass	Fail
Total monthly income to rent ratio exceeds 2.5	Pass/Fail		✓
Gross monthly income after rent and estimated debt exceeds 0.5 times the monthly rent	Pass/Fail	✓	
Has not had an employment verification that is false, negative or unable to verify	Pass/Fail	✓	
Maximum percentage of past due negative accounts is less than 33.0%	Moderately		✓
Unpaid collections and grossly delinquent past due balances do not exceed \$2,000.00	Very		✓
May have been through a bankruptcy	Pass/Fail	✓	
No Landlord Tenant Court records or unpaid landlord collections	Pass/Fail	✓	
Had not had a rental history verification that is false, negative or unable to verify	Pass/Fail	✓	
Has not had any misdemeanor convictions	Pass/Fail	✓	
Has not had any felony convictions	Pass/Fail	✓	
Is not a registered sex offender	Pass/Fail	✓	

This report does not guarantee the accuracy or truthfulness of the information as to the subject of the investigation, but only that it is accurately copied from public records, and information generated as a result of identity theft, including evidence of criminal activity, may be inaccurately associated with the consumer who is the subject of the report. An applicant who is the subject of this report may obtain a free copy at any time by contacting On-Site Renter Relations. *El solicitante que es objeto de este informe puede obtener una copia gratuita por contactar On-Site Renter Relations.*

WARNINGS**APPLICANT: Submitted Address First Reported In Last 90 Days (Experian)**

The bureau reports that the first time the applicant supplied this address was fewer than 90 days ago. This could indicate fraudulent activity, or could mean that the applicant moved recently; you should verify that the address supplied is valid.

APPLICANT: Inquiry/On-File Current Address Conflict (Experian)

The applicant's address does not match the address on record with the credit bureau. This could indicate fraudulent activity; you should verify that the address supplied is valid. Before proceeding you must verify that the information in the report relates to the actual applicant in question as required under FCRA Section 605(h). Review our bulletin for information on compliance.

APPLICANT: no matching birth date found

The name and DOB for the primary applicant does not match any records on file. Please check if you entered the name accurately and re-run the report if necessary. This warning means that the applicant fraudulently submitted incorrect information or that the record on file is incorrect. You should carefully verify the information on the application before proceeding.

SPECIAL CONDITION: income to rent ratio

On-Site.com identified an income to rent ratio that failed on this report. This recommendation has been automatically set to Decline.



Rental Report for GLENN P. THOMPSON, Jr., 7/28/2015 for 69-103 at Club Palisades

Credit Quick Summary**Custom scoring for this report:**

Payment history beyond 24 months not considered
Accounts with 2 30-day late payment or less are not considered negative
Do not consider mortgages in default.

Medical collections not considered
Accounts with less than \$100.00 past due are not considered negative

Student loans not considered
Do not consider foreclosures.

Total monthly income (reported by Applicant)	\$1,749.84	This applicant has no credit accounts on file
Total verified monthly income	\$1,749.84	
Total monthly income to rent ratio	2.07 (based on rent of \$1,288.00)	
Estimated monthly debt and rent payments	\$644.00 (100% of monthly rent)	
Total number of accounts	0	
Accounts with no late payments	0 (0 unpaid past due)	
Accounts paid 30-59 days past due	0 (0 unpaid past due)	
Accounts paid 60-89 days past due	0 (0 unpaid past due)	
Accounts paid more than 90 days past due	0 (0 unpaid past due)	
Total outstanding balance	\$0.00 (\$0.00 past due)	
Outstanding revolving debt	\$0.00 (0% of limit) (\$0.00 past due)	
Outstanding loan balance	\$0.00 (\$0.00 past due)	
Bankruptcies, foreclosures, and legal items	1	
Collection total balance (includes past due)	\$4,532.00	
Landlord tenant court records found	0	

Identity	From Application	From Experian
Name:	GLENN P. THOMPSON, Jr.	GLENN THOMPSON, JR GLENN THOMPSON
SSN:	██████	██████
Birth Date:	██████	

Addresses	From Application	From Experian
	9681 54TH AVE S SEATTLE, WA 98118 - US	9681 54TH AVE S SEATTLE, WA 98118-5704 (Applicant) Reported 6/2015 6105 S 124TH ST. SEATTLE, WA 98178-3543 (Applicant) Reported 7/2012 11273 29TH AVE SW SEATTLE, WA 98146-3458 (Applicant) Reported 10/2010

Employment	From Application	From Experian
Applicant:	CASINO SILVER DOLLAR CASINO \$1,749.84/Mo. Total monthly Income: \$1,749.84	GOLDEN NUGGET CASINO

Rental Report for GLENN P. THOMPSON, Jr., 7/28/2015 for 69-103 at Club Palisades

Verifications**Address: 9681 54TH AVE S**

Requested For GLENN P. THOMPSON, Jr. Requested Date 7/28/2015	Landlord from Application	Address	Prior Rent
	FRANCES CANNON (206) 721-3589	9681 54TH AVE S SEATTLE, WA 98118 - US	\$300.00
	Results	Contact	Verified Rent
	Verified Correct	FRANCES CANNON (Owner)	\$300.00/Month
	Date Started Occupancy	Late Notices	NSF Checks
	3/2015	0	0
	Account Standing	Delinquency	Would Rent Again?
	paid in full	Prompt Payer	Would Rent Again
	Any Damages Documented?	Any complaints regarding noise, pets or parking?	Pets in the Unit?
	No Damages Documented	No Complaints Documented	No
	Bed Bugs?	Applicant's Name on the Lease?	Lease Expiration Date
	No	Yes	Month-to-month
	Applicant is a Current Resident?	Applicant Notice Given?	
	Yes	Yes	
Comments From On-Site.com 7/30 1:21 PM PDT (AN) - Verbally verified correct. 7/29 3:06 PM PDT (RB) - *Please Note: Landlord/tenant court record, housing court lawsuit, or landlord collection found* 7/29 3:05 PM PDT (RB) - Called reference, person who answered stated office was closed today and said to call back tomorrow.			

Employer: SILVER DOLLAR CASINO

Requested For GLENN P. THOMPSON, Jr. Requested Date 7/28/2015	Position Held	Monthly Salary	Supervisor
	CASINO SILVER DOLLAR CASINO	\$1,749.84	GRANT (425) 251-1590
	Results	Contact	Verified Monthly Salary
	Verified Correct	Paystubs (see comments)	\$1,749.84
Comments From On-Site.com 7/30 1:10 PM PDT (AN) - Verified correct from pay stubs provided. Verified monthly/yearly income is \$20,998.12. 7/30 1:10 PM PDT (AN) - Employer verified by: http://ir.nevadagold.com/secfiling.cfm?filingID=1144204-11-41810&CIK=277058 7/29 3:09 PM PDT (RB) - The phone number provided 206-830-8548 is for a cell phone. We need an office number or company email address to continue verification process.			

Criminal History**From On-Site.com**

Requested For GLENN P. THOMPSON, Jr.	Location Searched (Insight America) Multi-State: AK, AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	Period Searched 7/28/2008 - 7/28/2015	Requested 7/28/2015	Returned 7/28/2015
Results No Records Found				

National Sex Offender Registry History**From On-Site.com**

Requested For GLENN P. THOMPSON, Jr.	Date Requested 7/28/2015	Date Returned 7/28/2015
Results No Records Found		

Landlord Tenant Court Records**From On-Site.com**

There were no previous Landlord Tenant Court records found.



Rental Report for GLENN P. THOMPSON, Jr., 7/28/2015 for 69-103 at Club Palisades

OFAC SDN/Terrorist Watchlist Search**From On-Site.com**

Requested For	Results	Returned
GLENN P. THOMPSON, Jr.	No records found	7/28/2015

Legal Items**From Experian**

Plaintiff	Date	Case Number	Comments	Satisfied	Amount
RAY KLEIN INC (Applicant) KING DIST CT -RENTON 3407 NE 2ND ST, RENTON, WA 98056 By mail only	8/2013	13411086	Judgment		\$4,532.00

Previous Credit Inquiries**From Experian**

6/2015	ON-SITE MANAGER INC (Applicant)
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Para informacion en espanol, visite www.consumerfinance.gov/learnmore o escribe a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness and privacy of information in the files of consumer reporting agencies (CRA's). There are many types of CRA's, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. **For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.**

You may have additional rights under Maine's FCRA, Me. Rev Stat. Ann. 10, Sec 1311 et seq.

- You must be told if information in your file has been used against you. Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address and phone number of the agency that provided the information.

- You have the right to know what is in your file. You may request and obtain all the information about you in the files of a CRA (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:

- A person has taken adverse action against you because of information in your credit report;
- You are the victim of identify theft and place a fraud alert in your file;
- Your file contains inaccurate information as a result of fraud;
- You are on public assistance;
- You are unemployed but expect to apply for employment within 60 days.

In addition, by September 2005 all consumers will be entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty CRA's. See www.consumerfinance.gov/learnmore for additional information.

- You have the right to ask for a credit score. Credit scores are numerical summaries of your credit worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

- You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See www.consumerfinance.gov/learnmore for an explanation of dispute procedures.

- CRA's must correct or delete inaccurate, incomplete or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.

- CRA's may not report outdated negative information. In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

- Access to your file is limited. A CRA may provide information about you only to people with a valid need – usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.

- You must give your consent for reports to be provided to employers. A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.consumerfinance.gov/learnmore.

- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report. Unsolicited "prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-567-8688.

- You may seek damages from violators. If a CRA, or, in some cases, a user of consumer reports or a furnisher of information to a CRA violates the FCRA, you may be able to sue in state or federal court.

- Identity theft victims and active duty military personnel have additional rights. For more information, visit www.consumerfinance.gov/learnmore.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact::

TYPE OF BUSINESS:	CONTACT:
1.a. Banks, saving associations, and credit unions with total assets of over \$10 billion and their affiliates. b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to Bureau:	a. Bureau of Consumer Financial Protection 1700 G Street NW Washington, DC 20006 b. Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357
2. To the extent not included in item above: a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations d. Federal Credit Unions	a. Office of the Comptroller of the Currency- Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050 b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480 c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106 d. National Credit Union Administration - Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314
3. Air carriers	Asst. General Counsel for Aviation Enforcement & Proceedings Department of Transportation 400 Seventh Street SW Washington, DC 20590
4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 1925 K Street NW Washington, DC 20423
5. Creditors Subject to Packers and Stockyards Act	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 406 Third Street, SW, 8th Floor Washington, DC 20416
7. Brokers and Dealers	Securities & Exchange Commission 100 F St NE Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357

**Washington State Applicant Addendum to:
A Summary of Your Rights Under the Fair Credit Reporting Act**

The Washington Fair Credit Reporting Act ("WFCRA"), located at Chapter 19.182 RCW, substantially parallels the federal Fair Credit Reporting Act and the rights and remedies set forth in the attached Summary of Rights, except that, effective July 22, 2007, the Washington State law imposes greater limitations on the reasons for which an employer may obtain a consumer report. Specifically, an employer may not obtain a consumer report that indicates the consumer's credit worthiness, credit standing, or credit capacity, unless (1) the information is substantially job related and the employer's reasons for using the information are disclosed in writing, or (2) the information is required by law.

Individuals may bring legal action in court to assert their rights under the WFCRA. The applicable statute of limitations is specified in Wash. Stat. § 19.182.120 and is generally two years from the date the cause of action accrued. Individuals who prevail on claims to enforce the WCFRA may obtain actual damages, monetary penalties, reasonable attorneys' fees, costs, and other relief.

For any questions, concerns or complaints regarding the WFCRA, you may contact the Attorney General for the State of Washington using the following information.

Main Office Telephone:

- (360) 753-6200

Division of Consumer Protection Telephone:

- (800) 551-4636 (in-state callers only)
- (800) 833-6388 (Washington State Relay Service for the hearing impaired)
- (206) 464-6684 (out-of-state callers)

Main Office Address:

1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100

Division of Consumer Protection Address:

Bellingham	Seattle	Vancouver
103 E. Holly Suite 308	800 5 th Ave, Suite 2000	1220 Main St, Suite 549
Bellingham, WA 98225	Seattle, WA 98104-3188	Vancouver, WA 98660-2964

Rental Report for Glenn Thompson, 6/25/2015 for P101 at Lodge at Peasley Canyon

Rental Report for Glenn Thompson**Overall Recommendation****DECLINE**

This application does not meet one or more of your requirements that is set to "Pass/Fail". This recommendation has been automatically set to Decline. The Overall Recommendation was derived solely from your community's leasing criteria. On-Site makes no independent assessment of an applicant's qualifications.

Application **Rejected** by Emily Foster on 7/13/2015.

Score for Glenn Thompson: DECLINE

	Importance	Pass	Fail
Total monthly income to rent ratio exceeds 2.8	Pass/Fail		✓
Gross monthly income after rent and estimated debt exceeds 25.0% of the monthly income	Extremely	✓	
Maximum percentage of past due negative accounts is less than 25.0%	Extremely		✓
Unpaid collections and grossly delinquent past due balances do not exceed \$2,000.00	Extremely	✓	
May have been through a bankruptcy	Pass/Fail	✓	
No Landlord Tenant Court records or unpaid landlord collections	Pass/Fail	✓	
Has not had any misdemeanor convictions in the last 3 years	Pass/Fail	✓	
Has not had any felony convictions in the last 7 years	Pass/Fail	✓	
Is not a registered sex offender	Pass/Fail	✓	

This report does not guarantee the accuracy or truthfulness of the information as to the subject of the investigation, but only that it is accurately copied from public records, and information generated as a result of identity theft, including evidence of criminal activity, may be inaccurately associated with the consumer who is the subject of the report. An applicant who is the subject of this report may obtain a free copy at any time by contacting On-Site Renter Relations. *El solicitante que es objeto de este informe puede obtener una copia gratuita por contactar On-Site Renter Relations.*

WARNINGS**The Contents Of This Report Are Being Disputed**

The contents of the credit section of this report are currently being reviewed for accuracy. This warning will be removed once this dispute has been resolved. For a status update, you may call On-Site.com's Renter Relations department at (877) 222-0384.

APPLICANT: Inquiry/On-File Current Address Conflict (Experian)

The applicant's address does not match the address on record with the credit bureau. This could indicate fraudulent activity; you should verify that the address supplied is valid. Before proceeding you must verify that the information in the report relates to the actual applicant in question as required under FCRA Section 605(h). Review our bulletin for information on compliance.

SPECIAL CONDITION: income to rent ratio

On-Site.com identified an income to rent ratio that failed on this report. This recommendation has been automatically set to Decline.

Lease Notebook

Date	User	Note
6/25/2015		Glenn Thompson (glenda_redditt@yahoo.com) was sent a copy of their Rental Report.
6/25/2015		Glenn Thompson Jr. (glennthompson_20@yahoo.com) was sent a copy of their Rental Report.



Rental Report for Glenn Thompson, 6/25/2015 for P101 at Lodge at Peasley Canyon

Credit Quick Summary		
Custom scoring for this report:		
Medical collections not considered		Do not consider foreclosures.
Total monthly income (reported by Applicant)	\$850.00	
Total monthly income to rent ratio	1.62 (based on rent of \$1,262.00)	
Estimated monthly debt and rent payments	\$706.40 (83% of monthly income)	
Total number of accounts	1	
Accounts with no late payments	1 (0 unpaid past due)	
Accounts paid 30-59 days past due	0 (0 unpaid past due)	
Accounts paid 60-89 days past due	0 (0 unpaid past due)	
Accounts paid more than 90 days past due	0 (0 unpaid past due)	
Total outstanding balance	\$0.00 (\$0.00 past due)	
Outstanding revolving debt	\$0.00 (0% of limit) (\$0.00 past due)	
Outstanding loan balance	\$0.00 (\$0.00 past due)	
Bankruptcies, foreclosures, and legal items	1	
Collection total balance (includes past due)	\$1,752.00	
Landlord tenant court records found	0	

Identity	From Application	From Experian
Name:	Glenn Thompson	GLENN THOMPSON PATRICK THOMPSON
SSN:		
Birth Date:		
Driver's License #:		

Addresses	From Application	From Experian
	9681 54th Ave S Seattle, WA 98118 - US	6105 S 124TH ST. SEATTLE, WA 98178-3543 (Applicant) Reported 5/2010 59TH AVE S SEATTLE, WA 98178 (Applicant) Reported 11/2006 11273 59TH AVE S SEATTLE, WA 98178-2943 (Applicant) Reported 3/2006

Employment	From Application	From Experian
Applicant:	\$0.00/Yr. Total monthly Income: \$850.00	T I ENTERPRISE

Criminal History				
From On-Site.com				
Requested For Glenn Thompson	Location Searched (Insight America) Multi-State: AK, AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	Period Searched 6/25/2008 - 6/25/2015	Requested 6/25/2015	Returned 6/25/2015
Results No Records Found				

Rental Report for Glenn Thompson, 6/25/2015 for P101 at Lodge at Peasley Canyon

National Sex Offender Registry History**From On-Site.com**

Requested For	Date Requested	Date Returned
Glenn Thompson	6/25/2015	6/25/2015
Results		
No Records Found		

Landlord Tenant Court Records**From On-Site.com**

There were no previous Landlord Tenant Court records found.

OFAC SDN/Terrorist Watchlist Search**From On-Site.com**

Requested For	Results	Returned
Glenn Thompson	No records found	6/25/2015

Collections**From Experian**

Client Name	Date	Last Active	Orig. Amount	Balance
AT T (Applicant) Collection Agency - ENHANCED RECOVERY CO L 8014 BAYBERRY RD, JACKSONVILLE, FL 32256 (800) 496-8941	11/2014		\$958.00	\$527.00
Comments				
ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name	Date	Last Active	Orig. Amount	Balance
TMOBILE (Applicant) Collection Agency - ENHANCED RECOVERY CO L 8014 BAYBERRY RD, JACKSONVILLE, FL 32256 (800) 496-8941	3/2014		\$301.00	\$301.00
Comments				
ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name	Date	Last Active	Orig. Amount	Balance
CENTURYLINK QWEST CORPORATION (Applicant) Collection Agency - EOS CCA PO BOX 981008, BOSTON, MA 02298	10/2014		\$216.00	\$216.00
Comments				
ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name	Date	Last Active	Orig. Amount	Balance
KENT (Applicant) Collection Agency - ALLIANCEONE RECEIVABLE 6565 KIMBALL DR, GIG HARBOR, WA 98335 (800) 456-8838	8/2013		\$209.00	\$209.00
Comments				
ACCOUNT ASSIGNED TO COLLECTIONS				
Client Name	Date	Last Active	Orig. Amount	Balance
SEATTLE (Applicant) Collection Agency - ALLIANCEONE RECEIVABLE 6565 KIMBALL DR, GIG HARBOR, WA 98335 (800) 456-8838	5/2010		\$130.00	\$130.00
Comments				
ACCOUNT ASSIGNED TO COLLECTIONS				



Rental Report for Glenn Thompson, 6/25/2015 for P101 at Lodge at Peasley Canyon

Client Name SEATTLE (Applicant) Collection Agency - ALLIANCEONE RECEIVABLE 6565 KIMBALL DR, GIG HARBOR, WA 98335 (800) 456-8838	Date 5/2009	Last Active	Orig. Amount \$74.00	Balance \$74.00
	Comments ACCOUNT ASSIGNED TO COLLECTIONS			
Client Name COAST NATIONAL INSURANCE COM (Applicant) Collection Agency - LAMONT HANLEY & ASSOCI 1138 ELM ST, MANCHESTER, NH 03101 (603) 625-5547	Date 9/2011	Last Active	Orig. Amount \$51.00	Balance \$51.00
	Comments ACCOUNT ASSIGNED TO COLLECTIONS			

Legal Items**From Experian**

Plaintiff STATE OF WASHINGTON (Applicant) KING SUPERIOR CT-SEATT 516 3RD AVE STE E609, SEATTLE, WA 98104 By mail only	Date 7/2013	Case Number 132250225	Comments Judgment	Satisfied	Amount \$244.00
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Credit Accounts**From Experian**

Account Name DSHS/DCS OLYMPIA (Applicant) DSHS/DCS OLYMPIA PO BOX 11520, TACOMA, WA 98411	Opened	Last Active	30-59	60-89	90+	Past Due	Balance																																																																		
	3/1993	8/2014	0	0	0	\$0.00	\$0.00																																																																		
	Monthly Payment	High Credit	Type	Comments																																																																					
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Lodge at Peasley Canyon

NOTICE OF DENIAL TO RENT

November 6, 2015

To: Glenn Thompson
 9681 54th Ave S
 Seattle, WA 98118

Thank you for applying for rental housing at Lodge at Peasley Canyon located at 32200 Military Rd South, Federal Way, WA 98001. **PLEASE TAKE NOTICE that your Application to Rent has been DENIED.** We are hereby informing you of certain information pursuant to the Fair Credit Reporting Act, 15 U.S.C. Section 1681, et seq., as amended by the Consumer Credit Reporting Reform Act of 1996 (Public Law 104-208, the Omnibus Consolidated Appropriations Act for the Fiscal Year 1997, Title II, Subtitle D, Chapter 1).

1. Reason for Denial This action has been taken based on the following:

- ☒ Information contained in a consumer credit report obtained from one or more of the consumer credit reporting agencies named in paragraph 2 of this notice.
- ☐ A consumer credit report containing insufficient information obtained from one or more of the consumer credit reporting agencies named in paragraph 2 of this notice.
- ☒ Other Reasons

2. Consumer Credit Reporting Agency When a credit report is used in making the decision, Section 615(a) of the Fair Credit Reporting Act requires us to tell you where we obtained that report. The consumer credit reporting agencies that provided the report were:

- ☐ **Equifax**, E.C.I.F., P.O. Box 740241, Atlanta, GA, 30374-0241, (800) 685-1111
- ☒ **Experian (TRW)**, Consumer Assistance, P.O. Box 2002, Allen, TX, 75013, (888) 397-3742
 For a free copy of your Experian Credit Report, please visit <http://www.experian.com/reportaccess>.
- ☒ **On-Site.com**, 307 Orchard City Drive, Suite 110, Campbell, CA 95008, (877) 222-0384, www.renterrelations.com
- ☐ **Trans Union**, Consumer Relations at P.O. Box 1000, Chester, PA, 19022, (800) 888-4213
www.transunion.com/myoptions
- ☐

- 3. Pursuant to Section 615 of the Fair Credit Reporting Act, we are notifying you that the above-noted agency only provided information about your credit history. It took no part in making the decision to regarding your rental application, nor can it explain why the decision was made.
- 4. In general. Whenever credit for personal, family, or household purposes involving a consumer is denied or the charge for such credit is increased either wholly or partly because of information obtained from a person other than a consumer reporting agency bearing upon the consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living, the user of such information shall, within a reasonable period of time, upon the consumer's written request for the reasons for such adverse action received within sixty days after learning of such adverse action, disclose the nature of the information to the consumer. The user of such information shall clearly and accurately disclose to the consumer his right to make such written request at the time such adverse action is communicated to the consumer.
- 5. You have certain rights under federal law, as explained in more detail in paragraphs 4-6 below. Pursuant to the Fair Credit Reporting Act, you have a right to obtain a copy of your credit report, dispute its accuracy, and provide a consumer statement describing your position if you dispute the credit report. If you believe your report is inaccurate or incomplete, you may call the consumer reporting agency at its number listed above or write to it at the listed address.
- 6. Pursuant to Section 612 of the Fair Credit Reporting Act, you have the right to obtain a free copy of your consumer report from the consumer reporting agency whose name is checked above. You must request the copy within 60 days of the date on this notice. Pursuant to Section 611 of the Fair Credit Reporting Act, if you dispute any of the information in your report, you have the right to put in your report a consumer statement of up to 100 words explaining your position on the item under dispute. Trained personnel are available to help prepare consumer statements.
- 7. You may have additional rights under the credit reporting or consumer protection laws of Washington.

(Owner/Agent)

Date

Glenn Thompson
 9681 54th Ave S
 Seattle, WA 98118



Initials: _____

Lodge at Peasley Canyon

Para informacion en español, visite www.consumerfinance.gov/learnmore o escriba a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.

A Summary of your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness and privacy of information in the files of consumer reporting agencies (CRA's). There are many types of CRA's, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is summary of your major rights under the FCRA. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.

You may have additional rights under Maine's FCRA, Me. Rev Stat. Ann. 10, Sec 1311 et seq.

- You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment - or to take another adverse action against you - must tell you, and must give you the name, address and phone number of the agency that provided the information.
- You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a CRA (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - A person has taken adverse action against you because of information in your credit report;
 - You are the victim of identity theft and place a fraud alert in your file;
 - Your file contain inaccurate information as a result of fraud;
 - You are on public assistance;
 - You are unemployed but expect to apply for employment within 60 days.

In addition, as of September 2005 all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty CRA's. See www.consumerfinance.gov/learnmore for additional information.

You have the right to ask for a credit score. Credit scores are numerical summaries of your credit worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create score or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See www.consumerfinance.gov/learnmore for an explanation of dispute procedures.

CRA's must correct or delete inaccurate, incomplete or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However a CRA may continue to report information it has verified as accurate.

CRA's may not report outdated negative information. In most cases, a CRA may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

Access to your file is limited. A CRA may provide information about you only to people with a valid need - usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.

You must give your consent for reports to be provided to employers. A CRA may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.consumerfinance.gov/learnmore

You may limit "prescreened" offers of credit and insurance you get based on information in your credit report. Unsolicited "Prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-567-8688.

- You may seek damages from violators.** If a CRA, or, in some cases, a user of consumer reports or a furnisher of information to a CRA violates the FCRA, you may be able to sue in state or federal court.
- Identity theft victims and active duty military personnel have additional rights.** For more information, visit www.consumerfinance.gov/learnmore.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under the state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact:

TYPE OF BUSINESS:	CONTACT:
1. a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates. b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the Bureau:	a. Bureau of Consumer Financial Protection 1700 G Street NW Washington, DC 20006 b. Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 (877) 382-4357
2. To the extent not included in item 1 above: a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations d. Federal Credit Unions	a. Office of the Comptroller of the Currency- Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050 b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480 c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106 d. National Credit Union Administration -Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314
3. Air carriers	Asst. General Counsel for Aviation Enforcement & Proceedings Department of Transportation 400 Seventh Street SW Washington, DC 20590
4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 1925 K Street NW Washington, DC 20423
5. Creditors Subject to Packers and Stockyards Act	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 406 Third Street, SW, 8th Floor Washington, DC 20416
7. Brokers and Dealers	Securities & Exchange Commission 100 F St NE Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 (877) 382-4357



Initials: _____

Para informacion en espanol, visite www.consumerfinance.gov/learnmore o escribe a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.

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- You have the right to know what is in your file. You may request and obtain all the information about you in the files of a CRA (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:

- A person has taken adverse action against you because of information in your credit report;
- You are the victim of identify theft and place a fraud alert in your file;
- Your file contains inaccurate information as a result of fraud;
- You are on public assistance;
- You are unemployed but expect to apply for employment within 60 days.

In addition, by September 2005 all consumers will be entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty CRA's. See www.consumerfinance.gov/learnmore for additional information.

- You have the right to ask for a credit score. Credit scores are numerical summaries of your credit worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

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TYPE OF BUSINESS:	CONTACT:
1.a. Banks, saving associations, and credit unions with total assets of over \$10 billion and their affiliates. b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to Bureau:	a. Bureau of Consumer Financial Protection 1700 G Street NW Washington, DC 20006 b. Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357
2. To the extent not included in item above: a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations d. Federal Credit Unions	a. Office of the Comptroller of the Currency- Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050 b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480 c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106 d. National Credit Union Administration - Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314
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4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 1925 K Street NW Washington, DC 20423
5. Creditors Subject to Packers and Stockyards Act	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 406 Third Street, SW, 8th Floor Washington, DC 20416
7. Brokers and Dealers	Securities & Exchange Commission 100 F St NE Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357

Washington State Applicant Addendum to: A Summary of Your Rights Under the Fair Credit Reporting Act

The Washington Fair Credit Reporting Act (“WFCRA”), located at Chapter 19.182 RCW, substantially parallels the federal Fair Credit Reporting Act and the rights and remedies set forth in the attached Summary of Rights, except that, effective July 22, 2007, the Washington State law imposes greater limitations on the reasons for which an employer may obtain a consumer report. Specifically, an employer may not obtain a consumer report that indicates the consumer’s credit worthiness, credit standing, or credit capacity, unless (1) the information is substantially job related and the employer’s reasons for using the information are disclosed in writing, or (2) the information is required by law.

Individuals may bring legal action in court to assert their rights under the WFCRA. The applicable statute of limitations is specified in Wash. Stat. § 19.182.120 and is generally two years from the date the cause of action accrued. Individuals who prevail on claims to enforce the WCFRA may obtain actual damages, monetary penalties, reasonable attorneys’ fees, costs, and other relief.

For any questions, concerns or complaints regarding the WFCRA, you may contact the Attorney General for the State of Washington using the following information.

Main Office Telephone:

- (360) 753-6200

Division of Consumer Protection Telephone:

- (800) 551-4636 (in-state callers only)
- (800) 833-6388 (Washington State Relay Service for the hearing impaired)
- (206) 464-6684 (out-of-state callers)

Main Office Address:

1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100

Division of Consumer Protection Address:

Bellingham	Seattle	Vancouver
103 E. Holly Suite 308	800 5 th Ave, Suite 2000	1220 Main St, Suite 549
Bellingham, WA 98225	Seattle, WA 98104-3188	Vancouver, WA 98660-2964

Rental Report for Glenn Thompson Jr., 6/25/2015 for P101 at Lodge at Peasley Canyon

Rental Report for Glenn Thompson Jr.**Overall Recommendation****DECLINE**

This application does not meet one or more of your requirements that is set to "Pass/Fail". This recommendation has been automatically set to Decline. The Overall Recommendation was derived solely from your community's leasing criteria. On-Site makes no independent assessment of an applicant's qualifications.

Application **Rejected** by Emily Foster on 7/13/2015.

Score for Glenn Thompson Jr.: DECLINE

	Importance	Pass	Fail
Total monthly income to rent ratio exceeds 2.8	Pass/Fail		✓
Gross monthly income after rent and estimated debt exceeds 25.0% of the monthly income	Extremely	✓	
Maximum percentage of past due negative accounts is less than 25.0%	Extremely		✓
Unpaid collections and grossly delinquent past due balances do not exceed \$2,000.00	Extremely		✓
May have been through a bankruptcy	Pass/Fail	✓	
No Landlord Tenant Court records or unpaid landlord collections	Pass/Fail	✓	
Has not had any misdemeanor convictions in the last 3 years	Pass/Fail	✓	
Has not had any felony convictions in the last 7 years	Pass/Fail	✓	
Is not a registered sex offender	Pass/Fail	✓	

This report does not guarantee the accuracy or truthfulness of the information as to the subject of the investigation, but only that it is accurately copied from public records, and information generated as a result of identity theft, including evidence of criminal activity, may be inaccurately associated with the consumer who is the subject of the report. An applicant who is the subject of this report may obtain a free copy at any time by contacting On-Site Renter Relations. *El solicitante que es objeto de este informe puede obtener una copia gratuita por contactar On-Site Renter Relations.*

WARNINGS**APPLICANT: Submitted Address Not In Records - ACTION REQUIRED (Experian)**

The bureau reports that the address supplied is invalid. This could indicate fraudulent activity; you should verify that the address supplied is valid. Before proceeding you must verify that the information in the report relates to the actual applicant in question as required by law under FCRA Section 605(h). Review our bulletin for information on compliance.

APPLICANT: Inquiry/On-File Current Address Conflict (Experian)

The applicant's address does not match the address on record with the credit bureau. This could indicate fraudulent activity; you should verify that the address supplied is valid. Before proceeding you must verify that the information in the report relates to the actual applicant in question as required under FCRA Section 605(h). Review our bulletin for information on compliance.

APPLICANT: no matching birth date found

The name and DOB for the primary applicant does not match any records on file. Please check if you entered the name accurately and re-run the report if necessary. This warning means that the applicant fraudulently submitted incorrect information or that the record on file is incorrect. You should carefully verify the information on the application before proceeding.

SPECIAL CONDITION: income to rent ratio

On-Site.com identified an income to rent ratio that failed on this report. This recommendation has been automatically set to Decline.

Lease Notebook

Date	User	Note
6/25/2015		Glenn Thompson (glenda_redditt@yahoo.com) was sent a copy of their Rental Report.
6/25/2015		Glenn Thompson Jr. (glennthompson_20@yahoo.com) was sent a copy of their Rental Report.



Rental Report for Glenn Thompson Jr., 6/25/2015 for P101 at Lodge at Peasley Canyon

Credit Quick Summary		
Custom scoring for this report:		
Medical collections not considered Do not consider foreclosures.		
Total monthly income (reported by Applicant)	\$1,200.00	This applicant has no credit accounts on file
Total monthly income to rent ratio	1.62 (based on rent of \$1,262.00)	
Estimated monthly debt and rent payments	\$631.00 (53% of monthly income)	
Total number of accounts	0	
Accounts with no late payments	0 (0 unpaid past due)	
Accounts paid 30-59 days past due	0 (0 unpaid past due)	
Accounts paid 60-89 days past due	0 (0 unpaid past due)	
Accounts paid more than 90 days past due	0 (0 unpaid past due)	
Total outstanding balance	\$0.00 (\$0.00 past due)	
Outstanding revolving debt	\$0.00 (0% of limit) (\$0.00 past due)	
Outstanding loan balance	\$0.00 (\$0.00 past due)	
Bankruptcies, foreclosures, and legal items	1	
Collection total balance (includes past due)	\$4,532.00	
Landlord tenant court records found	0	

Identity	From Application	From Experian
Name:	Glenn Thompson Jr.	GLENN PATRICK THOMPSON, JR GLENN THOMPSON
SSN:		
Birth Date:		
Driver's License #:		

Addresses	From Application	From Experian
	9681 54th Ave S Seattle, WA 98118 - US	6105 S 124TH ST. SEATTLE, WA 98178-3543 (Applicant) Reported 7/2012 11273 29TH AVE SW SEATTLE, WA 98146-3458 (Applicant) Reported 10/2010 11273 59TH AVE S SEATTLE, WA 98178-2943 (Applicant) Reported 9/2008

Employment	From Application	From Experian
Applicant:	Security Golden Nugget Casino \$14,400.00/Yr. Total monthly Income: \$1,200.00	

Criminal History				
From On-Site.com				
Requested For Glenn Thompson Jr.	Location Searched (Insight America) Multi-State: AK, AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY	Period Searched 6/25/2008 - 6/25/2015	Requested 6/25/2015	Returned 6/25/2015
Results No Records Found				

Rental Report for Glenn Thompson Jr., 6/25/2015 for P101 at Lodge at Peasley Canyon

National Sex Offender Registry History

From On-Site.com

Requested For	Date Requested	Date Returned
Glenn Thompson Jr.	6/25/2015	6/25/2015
Results		
No Records Found		

Landlord Tenant Court Records

From On-Site.com

There were no previous Landlord Tenant Court records found.

OFAC SDN/Terrorist Watchlist Search

From On-Site.com

Requested For	Results	Returned
Glenn Thompson Jr.	No records found	6/25/2015

Legal Items

From Experian

Plaintiff	Date	Case Number	Comments	Satisfied	Amount
RAY KLEIN INC (Applicant) KING DIST CT -RENTON 3407 NE 2ND ST, RENTON, WA 98056 By mail only	8/2013	13411086	Judgment		\$4,532.00



Lodge at Peasley Canyon

NOTICE OF DENIAL TO RENT

November 6, 2015

To: Glenn Thompson Jr.
9681 54th Ave S
Seattle, WA 98118

Thank you for applying for rental housing at Lodge at Peasley Canyon located at 32200 Military Rd South, Federal Way, WA 98001. **PLEASE TAKE NOTICE that your Application to Rent has been DENIED.** We are hereby informing you of certain information pursuant to the Fair Credit Reporting Act, 15 U.S.C. Section 1681, et seq., as amended by the Consumer Credit Reporting Reform Act of 1996 (Public Law 104-208, the Omnibus Consolidated Appropriations Act for the Fiscal Year 1997, Title II, Subtitle D, Chapter 1).

1. Reason for Denial This action has been taken based on the following:

- ☒ Information contained in a consumer credit report obtained from one or more of the consumer credit reporting agencies named in paragraph 2 of this notice.
- ☐ A consumer credit report containing insufficient information obtained from one or more of the consumer credit reporting agencies named in paragraph 2 of this notice.
- ☒ Other Reasons

2. Consumer Credit Reporting Agency When a credit report is used in making the decision, Section 615(a) of the Fair Credit Reporting Act requires us to tell you where we obtained that report. The consumer credit reporting agencies that provided the report were:

- ☐ **Equifax**, E.C.I.F., P.O. Box 740241, Atlanta, GA, 30374-0241, (800) 685-1111
- ☒ **Experian (TRW)**, Consumer Assistance, P.O. Box 2002, Allen, TX, 75013, (888) 397-3742
For a free copy of your Experian Credit Report, please visit <http://www.experian.com/reportaccess>.
- ☒ **On-Site.com**, 307 Orchard City Drive, Suite 110, Campbell, CA 95008, (877) 222-0384, www.renterrelations.com
- ☐ **Trans Union**, Consumer Relations at P.O. Box 1000, Chester, PA, 19022, (800) 888-4213
www.transunion.com/myoptions
- ☐

- 3. Pursuant to Section 615 of the Fair Credit Reporting Act, we are notifying you that the above-noted agency only provided information about your credit history. It took no part in making the decision to regarding your rental application, nor can it explain why the decision was made.
- 4. In general. Whenever credit for personal, family, or household purposes involving a consumer is denied or the charge for such credit is increased either wholly or partly because of information obtained from a person other than a consumer reporting agency bearing upon the consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living, the user of such information shall, within a reasonable period of time, upon the consumer's written request for the reasons for such adverse action received within sixty days after learning of such adverse action, disclose the nature of the information to the consumer. The user of such information shall clearly and accurately disclose to the consumer his right to make such written request at the time such adverse action is communicated to the consumer.
- 5. You have certain rights under federal law, as explained in more detail in paragraphs 4-6 below. Pursuant to the Fair Credit Reporting Act, you have a right to obtain a copy of your credit report, dispute its accuracy, and provide a consumer statement describing your position if you dispute the credit report. If you believe your report is inaccurate or incomplete, you may call the consumer reporting agency at its number listed above or write to it at the listed address.
- 6. Pursuant to Section 612 of the Fair Credit Reporting Act, you have the right to obtain a free copy of your consumer report from the consumer reporting agency whose name is checked above. You must request the copy within 60 days of the date on this notice. Pursuant to Section 611 of the Fair Credit Reporting Act, if you dispute any of the information in your report, you have the right to put in your report a consumer statement of up to 100 words explaining your position on the item under dispute. Trained personnel are available to help prepare consumer statements.
- 7. You may have additional rights under the credit reporting or consumer protection laws of Washington.

(Owner/Agent)

Date

Glenn Thompson Jr.
9681 54th Ave S
Seattle, WA 98118



Initials: _____

Lodge at Peasley Canyon

Para informacion en español, visite www.consumerfinance.gov/learnmore o escriba a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.

A Summary of your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness and privacy of information in the files of consumer reporting agencies (CRA's). There are many types of CRA's, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is summary of your major rights under the FCRA. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20006.

You may have additional rights under Maine's FCRA, Me. Rev Stat. Ann. 10, Sec 1311 et seq.

- You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment - or to take another adverse action against you - must tell you, and must give you the name, address and phone number of the agency that provided the information.
- You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a CRA (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - A person has taken adverse action against you because of information in your credit report;
 - You are the victim of identity theft and place a fraud alert in your file;
 - Your file contain inaccurate information as a result of fraud;
 - You are on public assistance;
 - You are unemployed but expect to apply for employment within 60 days.

In addition, as of September 2005 all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty CRA's. See www.consumerfinance.gov/learnmore for additional information.

You have the right to ask for a credit score. Credit scores are numerical summaries of your credit worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create score or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See www.consumerfinance.gov/learnmore for an explanation of dispute procedures.

CRA's must correct or delete inaccurate, incomplete or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However a CRA may continue to report information it has verified as accurate.

CRA's may not report outdated negative information. In most cases, a CRA may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

Access to your file is limited. A CRA may provide information about you only to people with a valid need - usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.

You must give your consent for reports to be provided to employers. A CRA may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.consumerfinance.gov/learnmore

You may limit "prescreened" offers of credit and insurance you get based on information in your credit report. Unsolicited "Prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-567-8688.

- You may seek damages from violators.** If a CRA, or, in some cases, a user of consumer reports or a furnisher of information to a CRA violates the FCRA, you may be able to sue in state or federal court.
- Identity theft victims and active duty military personnel have additional rights.** For more information, visit www.consumerfinance.gov/learnmore.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under the state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact:

TYPE OF BUSINESS:	CONTACT:
1. a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates. b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the Bureau:	a. Bureau of Consumer Financial Protection 1700 G Street NW Washington, DC 20006 b. Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 (877) 382-4357
2. To the extent not included in item 1 above: a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations d. Federal Credit Unions	a. Office of the Comptroller of the Currency- Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050 b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480 c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106 d. National Credit Union Administration -Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314
3. Air carriers	Asst. General Counsel for Aviation Enforcement & Proceedings Department of Transportation 400 Seventh Street SW Washington, DC 20590
4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 1925 K Street NW Washington, DC 20423
5. Creditors Subject to Packers and Stockyards Act	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 406 Third Street, SW, 8th Floor Washington, DC 20416
7. Brokers and Dealers	Securities & Exchange Commission 100 F St NE Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 (877) 382-4357



Initials: _____

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- You must be told if information in your file has been used against you. Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address and phone number of the agency that provided the information.

- You have the right to know what is in your file. You may request and obtain all the information about you in the files of a CRA (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:

- A person has taken adverse action against you because of information in your credit report;
- You are the victim of identify theft and place a fraud alert in your file;
- Your file contains inaccurate information as a result of fraud;
- You are on public assistance;
- You are unemployed but expect to apply for employment within 60 days.

In addition, by September 2005 all consumers will be entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty CRA's. See www.consumerfinance.gov/learnmore for additional information.

- You have the right to ask for a credit score. Credit scores are numerical summaries of your credit worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

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TYPE OF BUSINESS:	CONTACT:
1.a. Banks, saving associations, and credit unions with total assets of over \$10 billion and their affiliates. b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to Bureau:	a. Bureau of Consumer Financial Protection 1700 G Street NW Washington, DC 20006 b. Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357
2. To the extent not included in item above: a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations d. Federal Credit Unions	a. Office of the Comptroller of the Currency- Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050 b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480 c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106 d. National Credit Union Administration - Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314
3. Air carriers	Asst. General Counsel for Aviation Enforcement & Proceedings Department of Transportation 400 Seventh Street SW Washington, DC 20590
4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 1925 K Street NW Washington, DC 20423
5. Creditors Subject to Packers and Stockyards Act	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 406 Third Street, SW, 8th Floor Washington, DC 20416
7. Brokers and Dealers	Securities & Exchange Commission 100 F St NE Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357

Exhibit D

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OSMT000043

**Washington State Applicant Addendum to:
A Summary of Your Rights Under the Fair Credit Reporting Act**

The Washington Fair Credit Reporting Act ("WFCRA"), located at Chapter 19.182 RCW, substantially parallels the federal Fair Credit Reporting Act and the rights and remedies set forth in the attached Summary of Rights, except that, effective July 22, 2007, the Washington State law imposes greater limitations on the reasons for which an employer may obtain a consumer report. Specifically, an employer may not obtain a consumer report that indicates the consumer's credit worthiness, credit standing, or credit capacity, unless (1) the information is substantially job related and the employer's reasons for using the information are disclosed in writing, or (2) the information is required by law.

Individuals may bring legal action in court to assert their rights under the WFCRA. The applicable statute of limitations is specified in Wash. Stat. § 19.182.120 and is generally two years from the date the cause of action accrued. Individuals who prevail on claims to enforce the WCFRA may obtain actual damages, monetary penalties, reasonable attorneys' fees, costs, and other relief.

For any questions, concerns or complaints regarding the WFCRA, you may contact the Attorney General for the State of Washington using the following information.

Main Office Telephone:

- (360) 753-6200

Division of Consumer Protection Telephone:

- (800) 551-4636 (in-state callers only)
- (800) 833-6388 (Washington State Relay Service for the hearing impaired)
- (206) 464-6684 (out-of-state callers)

Main Office Address:

1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100

Division of Consumer Protection Address:

Bellingham	Seattle	Vancouver
103 E. Holly Suite 308	800 5 th Ave, Suite 2000	1220 Main St, Suite 549
Bellingham, WA 98225	Seattle, WA 98104-3188	Vancouver, WA 98660-2964